

Facility: American Steel Foundries (ASF)
 U.S. EPA I.D. No. : OH 981 909 4/8
 Street: 1001 E. Broadway St.
 City: Alliance State: OH Zip: 44601
 Telephone: (216) 823-6150

Owner/Operator:

Street: 205 N. Michigan
 City: Chicago State: IL Zip: 60601
 Telephone: _____

Inspection Date: 7/5+6/90 Time: 4:00 pm & 9:00 am

Weather Conditions: Cloudy Temp. 80°F, Over cast 72°F

	<u>Name</u>	<u>Agency/Title</u>	<u>Telephone</u>
Inspectors:	<u>Ahmed Mustafa</u>	<u>OEPA-NEDO/ENV. Eng.</u>	<u>(216)-425-9171</u>
	<u>Mark Bergman</u>	<u>OEPA-NEDO/ENV. Eng.</u>	<u>(216)-425-9171</u>
Facility Representative:	<u>Bill HUGSTAND</u>	<u>SAFETY</u>	_____

	<u>Generate</u>	<u>Transport</u>	<u>Treat</u>	<u>Store</u>	<u>Dispose</u>
F-Solvent	<u>X</u>	_____	_____	<u>X</u>	_____
Dioxin	_____	_____	_____	_____	_____
California List	<u>X</u>	_____	_____	_____	_____
First Third	_____	_____	_____	_____	_____
Second Third	_____	_____	_____	_____	_____

INSPECTION SUMMARY

Processes That Generate LDR Wastes

- PARTS cleaning Solvents, consisting of Toluene and tetrachloroethylene and Pentachloroethylene. The waste generated is coded as F001 & F005
- PARTS cleaning Naphtha, it is used ^{to clean} ~~the~~ part and Remains captive in a product form until removed by Safety Kleen as a waste, ^{which} ~~that~~ is coded D001.

LDR Waste Management

F001 & F005 are accumulated in 55 Gallon Drums and Sent to ~~Safety~~ Safety Kleen, New Castle, KY for Reclamation.

D001 is generated ~~at~~ ^{at} the time Safety Kleen pickup the spent product from the container. It is sent to Safety Kleen, Kent, Ohio.

Summary

- ASF generates Non-Waste Water D005, D006, & D008 which are NOT a subject of LDR, until August 1990.
- ASF USES LDR Forms and complete up to date

RCRA LAND DISPOSAL RESTRICTION INSPECTION

WASTE IDENTIFICATION

1. Does the facility handle the following wastes?

a. F001 through F005 spent solvents

Yes ☒ No ☐ List* F001 & F005 only

b. Dioxin-containing Wastes

Yes ☐ No ☒ List* _____

c. California List Wastes

Yes ☒ No ☐ List* D001

d. First and Second Third Wastes

Yes ☐ No ☒ List* _____

* List wastes if room allows or attach Appendix A.

Note: Please be aware of potential misclassification of wastes (i.e., California list/"soft hammer"/characteristic waste applicabilities).

2. Does the facility handle the following wastes (national capacity variances)?

a. F001 - F005 contaminated soil or debris resulting from a CERCLA response action or RCRA corrective action (effective date — 11/08/90).

Yes ☐ No ☒ Comments _____

b. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (effective date — 11/08/90).

Yes ☐ No ☒ Comments _____

c. California list contaminated soil or debris resulting from a CERCLA response action or a RCRA corrective action (effective date — 11/08/90).

Yes ☐ No ☒ Comments _____

- d. First Third wastes with the following waste codes: K048, K049, K050, K051, K052, or K071 (effective date - 08/08/90).

Yes ☐ No ☒ Comments _____

- e. First Third contaminated soil and debris which have a treatment standard based on incineration - K016, K018, K019, K020, K022, K024, K030, K037, K048-K052, K086, K087, K101, K102, K103, and K104 (effective date - 08/08/90).

Yes ☐ No ☒ Comments _____

- f. Second Third contaminated soil and debris which have a treatment standard based on incineration - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U109, U221, U223, U235 (effective date - 06/08/91).

Yes ☐ No ☒ Comments _____

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

Yes ☒ No ☐ NA ☐

If yes, check the appropriate treatability group.

☐ Wastewaters containing solvents (less than or equal to 1% total organic carbon (TOC) by weight)
☒ All other spent solvent wastes

2. First and Second Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

Yes ☐ No ☐ NA ☒

If yes, list the waste code and check the correct treatability group.

Waste Code	Wastewater*	Non-wastewater
_____	_____	_____
_____	_____	_____
_____	_____	_____

* Less than 1% TOC by weight and less than 1% filterable solids.

3. California List Wastes: Has the generator correctly identified the required treatment technology [268.42]?

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

Yes ☐ No ☐ NA ☒

If yes, specify the method: _____

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated [40 CFR 761.70] or disposed of by other approved alternate methods [40 CFR 761.60(e)]?

Yes ☐ No ☐ NA ☒

If an alternative method is used, specify the method and state whether the facility has received approval from the Regional Administrator or Director, Exposure Evaluation Division, for an exemption from the incineration requirement:

- c. For hazardous waste that contains halogenated organic compounds (HOCs) in total concentrations greater than or equal to 1,000 mg/L or 1,000 mg/Kg (except dilute HOC wastewater), is the waste incinerated in accordance with existing requirements of 40 CFR Part 264 Subpart O or 40 CFR Part 265 Subpart O?

Yes ☒ No ☐ NA ☐

4. Does the generator mix restricted wastes with different treatment standards?

Yes ☐ No ☒ Comments

If yes, did the generator select the most stringent treatment standards (268.41(b), 268.43(b))?

Yes ☐ No ☐ Comments

B. Waste Analysis

1. Does the generator determine whether the restricted waste exceeds treatment standards or prohibition levels at the point of generation by:

- Knowledge of waste Yes ☒ No ☐

List the wastes for which "applied knowledge" was used and describe the basis of the applied knowledge determination.

* Pool 1: The use of MSDS Form 3, which is given to ASF by Safety Klean.

* Pool 2 & Pool 5: By knowledge of the process, then tested to confirm.

Was all supporting data retained on-site, [268.7(a)(5)]?

Yes ☒ No ☐

- TCLP Yes ☐ No ☐ NA ☒

List the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- Total constituent analysis Yes ☒ No ☐ NA ☐

List the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

Dool, Fool, Foos * 4/3/1990 * As generated and
shipped to safety Klean.

- pH ≤ 2 Yes ☐ No ☐ NA ☒

List the wastes for which pH testing was used.

- Paint Filter Liquid Test Yes ☐ No ☐ NA ☒

List the wastes for which PFLT was used.

2. Does the facility dilute the restricted waste as a substitute for adequate treatment [268.3]?

Yes ☐ No ☐ NA ☐

C. Management

1. On-Site Management

Is restricted waste treated, stored for greater than 90 days, or disposed on-site?

Yes ☒ No ☐ Comments F-Solvent ^{is} stored on site since Dec. 20

If yes, the TSD Checklist must be completed.

2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

Yes ☒ No ☐ (If no, go to b)

If yes, identify waste code and off-site treatment or storage facilities:

Waste Code	Facilities	Treat/Store
D001	Safety Kleen, Kent, Oh	Store
F001	Safety Kleen, Newcastle, Ky.	Treat
F005		

- Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

Yes ☒ No ☐

- Does notification contain the following?

EPA Hazardous waste number(s) Yes ☒ No ☐

Applicable treatment standards and prohibition levels Yes ☒ No ☐

Manifest number Yes ☒ No ☐

Waste analysis data, if available Yes ☒ No ☐

- b. Does the facility ship any waste that meets the treatment standards to an off-site disposal facility?

Yes ☒ No ☐ (If no, go to c)

If yes, identify waste code and off-site disposal facilities:

Waste Code	Facility
D001 [Combustible Liquid] RQ WASTE OIL	Safety Kleen, Kent, Ohio

- Does the facility provide notification and certification to the disposal facility [268.7(a)(2)]?

Yes ___ No ___

- Does notification contain the following?

EPA Hazardous waste number(s) Yes ___ No ___

Applicable treatment standards and prohibition levels Yes ___ No ___

Manifest number Yes ___ No ___

Waste analysis data, if available Yes ___ No ___

Certification that the waste meets treatment standards [wording in 268.7(a)(2)(ii)] Yes ___ No ___

- c. Is the waste subject to a nationwide variance, case-by-case extension (268.5), or no migration petition (268.6).

Yes ___ No X (If no, go to d)

- If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

Yes ___ No ___

- Does the notification contain the following information?

EPA hazardous waste number Yes ___ No ___

The corresponding treatment standards and all applicable prohibitions Yes ___ No ___

Manifest number Yes ___ No ___

Waste analysis data, if available Yes ___ No ___

Date the waste is subject to the prohibitions Yes ___ No ___

- d. Does the facility generate any First or Second Third "soft hammer" waste?

Yes ___ No ___

NA

(If no, go to 4)

NA

Does the generator provide the following notification to the receiving facility with each shipment of waste [268.7(a)(4)]?

- | | | | | | |
|-------|--|-----|-----|----|-----|
| (i) | EPA hazardous waste number | Yes | ___ | No | ___ |
| (ii) | Applicable prohibition
[268.33(f), 268.34(h)] | Yes | ___ | No | ___ |
| (iii) | Manifest number | Yes | ___ | No | ___ |
| (iv) | Waste analysis data,
if available | Yes | ___ | No | ___ |

3. "Soft Hammer" Demonstrations/Certifications

a. Are any "soft hammer" wastes or treatment residues destined for ultimate disposal in a landfill or surface impoundment?

Yes ___ No ___

b. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?

Yes ___ No ___

c. Has the generator submitted a demonstration and certification to the Regional Administrator to document its efforts to locate practically available treatment [268.8(a)(2)]?

Yes ___ No ___

- If yes, did the generator submit the documentation and certification prior to first shipment?

Yes ___ No ___

d. Does the demonstration contain the following information?

A list of facilities and facility officials contacted?

Yes ___ No ___

Addresses

Yes ___ No ___

Telephone numbers

Yes ___ No ___

Contact dates

Yes ___ No ___

Certification statement

Yes ___ No ___

NA

Attach a copy of the demonstration and certification.

- e. If there is no practically available treatment, has the generator included with the demonstration, a written discussion of why the generator was not able to obtain treatment or recovery for that waste [268.8(a)(2)(i)]?

Yes ___ No ___ NA ___

If yes, attach a copy of written discussion.

- f. Does the generator ship its "soft hammer" waste off-site for treatment?

Yes ___ No ___

Describe the type of treatment and treatment facilities:

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Facility</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

- g. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

Yes ___ No ___

- h. Does the generator provide certification with each subsequent shipment of wastes to receiving facilities?

Yes ___ No ___ NA ___

4. Records Retention

Does the facility retain on-site copies of all notifications, demonstrations, and certifications for a period of 5 years [268.7(a)(6)]?

Yes X No ___ Comments LDR Notifications begun DEC, 1989.

D. RCRA Corrective Action and CERCLA Response Action Waste *NA*

1. ~~Has the facility disposed of contaminated soil and debris from a RCRA corrective action or a CERCLA response action in a landfill or surface impoundment?~~

~~Yes ___ No ___ Comments _____~~

2. ~~Did the unit meet the minimum technology requirements (double liner, leachate collection system, and ground-water monitoring)?~~

~~Yes ___ No ___ NA ___ Comments _____~~

E. Treatment Using RCRA 264/265 Exempt Units or Processes *NA*

1. ~~Is waste treated in RCRA 264/265 exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?~~

~~Yes ___ No ___~~

~~List types of waste treatment units and processes:~~

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Units and Processes</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

2. ~~Are treatment residuals generated from these units?~~

~~Yes ___ No ___ Comments _____~~

~~If yes, the residues are subject to the LDR generator requirements.~~

3. ~~Are these residuals further treated, stored for greater than 90 days, or disposed on-site?~~

~~Yes ___ No ___ NA ___ Comments _____~~

~~If yes, the TSD checklist must be completed.~~

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TRANSPORTER CHECKLIST

NA

~~TRANSPORTER REQUIREMENTS~~

- A. Does the transporter accumulate waste for more than 10 days [268.50(a)(3)]?

Yes ___ No ___

If yes, check the appropriate regulatory status:

___ Interim status for storage
___ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days:

- B. Does the transporter mix, combine, or recontainerize wastes?

Yes ___ No ___

If yes, list the restricted wastes that have been mixed.

- C. Is the waste treated in an exempt treatment process on-site?

Yes ___ No ___

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264/265.13]?

F-solvent
(TCLP)*Yes ☐ No ☒ NA ☐Dioxin
(TCLP)Yes ☐ No ☐ NA ☒

California List

Yes ☐ No ☒ NA ☐
(PFLT and/or total constituent analysis)*

First & Second Third

Yes ☐ No ☐ NA ☒
(TCLP and/or total constituent analysis)* TCLP= Toxicity Characteristic Leaching Procedure (268, App. I)
PFLT= Paint Filter Liquids Test (SW-846)* ASF Does NOT
Have a waste
Analysis Plan

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

Yes ☒ No ☐

Comments

This is Done thru Safety Kleen prior to Shipment

- a. What date was the waste analysis plan last revised? NA

No Analysis Plan

- b. Are analyses conducted on-site or off-site?

☐ On-site☒ Off-site

Identify off-site lab:

Safety Kleen, Elgin, IL

- c. Are F-solvent and dioxin containing waste analyzed using TCLP?

Yes ☐ No ☒ NA ☐

- d. Are California List wastes analyzed using the appropriate analytical method (PFLT filtrate for metals and cyanide; total constituent analysis for corrosive wastes, PCBs and halogenated organic compounds (HOCs).

Yes ☒ No ☐ NA ☐

- e. Are First Third and Second Third wastes analyzed using the appropriate analytical method for the specified BDAT* (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)? See Appendix B.

Yes ☐ No ☐ NA ☒

* BDAT= best demonstrated available technology

3. Are the operating records, including analyses and quantities, complete [264/265.73]?
 Yes ☐ No ☒ ** It is done on Drum Storage area (unpermitted) poly pack containers which contained less than 90 DAYS DRUMS (HAZARDOUS).*

4. Do operating records contain copies of the notification, certification, and demonstration (if applicable) from the generator? Records must be kept until closure of unit.

Yes ☒ No ☐ Comments No Permitted Units on-Site.

B. Storage (268.50)

1. Are prohibited wastes* stored on-site?

Yes ☐ No ☒ (If no, go to C, Treatment.)

* Prohibited wastes are a subset of restricted wastes, i.e., they are those restricted wastes that are currently ineligible for land disposal [53 FR 31208, August 17, 1988].

2. If yes, identify storage unit.

☐ Tanks
☐ Containers
☐ Other (Identify inappropriate storage unit(s). _____)

3. Are all containers clearly marked to identify the contents and date(s) entering storage [268.50(a)(2)]?

Yes ☐ No ☐ NA ☐

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage (264/265.73)?

Yes ___ No ___

5. Do operating records agree with container labeling [268.50(a)(2) and 264/265.73]?

Yes ___ No ___ NA ___

6. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

Yes ___ No ___ NA ___

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is greater than the tank volume?

Yes ___ No ___

7. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record [268.50(a)(2)]?

Yes ___ No ___ NA ___

8. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect [268.50(c)]?

Yes ___ No ___ NA ___

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

Yes ___ No ___ NA ___

If yes, state how: _____

9. Has liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm being stored:

- a. In a facility meeting the TSCA criteria in 761.65(b)?

Yes ___ No ___ NA ___

- b. More than one year [268.50(f)]?

Yes ___ No ___ NA ___

C. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

Yes ___ No ___ (If No, go to D, Surface Impoundments.)

2. Describe the waste codes and treatment processes:

Waste Code

Treatment Processes

_____	_____
_____	_____
_____	_____

3. Was dilution used as a substitute for treatment [268.3]?

Yes ___ No ___ Comments _____

4. Does the facility, in accordance with an acceptable waste analysis plan, test the residue from all treatment processes [268.7(b)]?

Yes ___ No ___ Comments _____

Have treatment standards or prohibition levels been met?

Yes ___ No ___ Comments _____

5. Does the facility ship any waste or treatment residue to an off-site disposal facility?

Yes ___ No ___ NA ___

If yes, does the treatment facility provide notification and certification to the disposal facility [268.7(b)(4) and (5)]??

Yes ___ No ___ (If yes, the Generator portion of the checklist must be completed.)

6. If the waste or treatment residue will be further managed at a different treatment or storage facility, has the facility complied with the generator notice and certification requirements [268.7(a)]?

Yes ___ No ___

7. Does the facility treat "soft hammer" wastes?

Yes ☐ No ☐ (If no, go to 8.)

a. If yes, is the waste treated in accordance with the generator's certification/demonstration [268.8(c)(1)]?

Yes ☐ No ☐

b. Did the treatment facility certify that the "soft hammer" waste was treated in accordance with the generator's demonstration, [268.8(c)(1)]?

Yes ☐ No ☐

8. Does the facility ship any "soft hammer" waste to an off-site treatment, recovery, disposal or storage facility?

Yes ☐ No ☐ NA ☐

If yes, does the treatment facility send a copy of the generator's "soft hammer" demonstration and certification to the receiving treatment, recovery, disposal or storage facility along with its treatment certification [268.8(c)(2)]?

Yes ☐ No ☐ NA ☐

Identify waste codes and off-site facilities:

Waste Code

Facility

9. Are notifications, demonstrations, certifications (if applicable), and results of waste analysis prepared by the generators, kept in the operating record until facility closure [264/265.73(b)]?

Yes ☐ No ☐

D. Surface Impoundments

1. Are prohibited wastes placed in surface impoundments for treatment?
Yes ___ No ___ List _____ (If no, go to E, Land Disposal.)
2. Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment?
Yes ___ No ___
3. Did the facility submit to the Agency, the waste analysis plan, as well as, the certification of compliance with minimum technology and ground-water monitoring requirements?
Yes ___ No ___
4. If the minimum technology requirements have not been met, has a waiver been granted for that unit?
Yes ___ No ___ NA ___
5. Have the Subpart F groundwater monitoring requirements been met?
Yes ___ No ___ NA ___
6. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?
Yes ___ No ___
Attach test results.
7. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 40 CFR 268, or where no treatment standards are established for a waste, the applicable prohibition levels?
Sludge Yes ___ No ___ Waste Code _____
Supernatant Yes ___ No ___ Waste Code _____
8. Provide the frequency of analyses conducted on treatment residues:

NA

TSD

9. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268?

Yes ___ No ___

10. Are sludge residues that exceed the treatment standards and/or prohibition levels removed adequately on an annual basis?

Yes ___ No ___ Comments _____

a. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

Yes ___ No ___

b. Are residues subsequently managed in another surface impoundment?

Yes ___ No ___

c. Are residues treated prior to disposal?

Yes ___ No ___ Comments _____

If yes, are waste residues treated on-site or off-site?

On-site ___ Off-site ___

Identify waste code and treatment method:

<u>Waste Code</u>	<u>Treatment Method</u>
_____	_____
_____	_____
_____	_____
_____	_____

11. If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume?

Yes ___ No ___ Comments _____

E. Land Disposal

1. Are restricted and/or prohibited wastes placed in land disposal units such as landfills, surface impoundments, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers?

Yes ☐ No ☐

Note: Do not include surface impoundments addressed in D, Surface Impoundments.

If yes, specify which units and what wastes each unit has received:

2. Does the facility's operating record contain notices, certifications, and "soft hammer" demonstrations from generators/storers/treaters? These records must be maintained until facility closure.

Yes ☐ No ☐

3. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

Yes ☐ No ☐

If yes, at what frequency?

4. If prohibited wastes that exceed the treatment standards are placed in land disposal units (excluding wastes subject to national capacity variances) [268.30(a)], does the facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance from treatment standards [268.44]?

Yes ☐ No ☐

5. Does the facility dispose of restricted wastes that are subject to a national capacity variance or the "soft hammer" provisions?

Yes ☐ No ☐ Comments

If yes, have the minimum technology requirements been met for all units receiving such wastes?

Yes ☐ No ☐

6. Does the facility have notices [268.7(a)(3)] and records for disposed wastes that are subject to national capacity variances, case-by-case extensions [268.5], no migration petitions [268.6], or a variance from treatment standards?

Yes ___ No ___ NA ___

7. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

Yes ___ No ___ NA ___

8. Are restricted wastes placed in underground injection wells?

Yes ___ No ___ List _____

LIST OF RESTRICTED WASTES

CODES:

Asterisk (*) = U.S. EPA has established treatment standards or prohibition levels.
 No asterisk = Soft hammer wastes.
Underlined = Potential California List applicability.
Bold Print = Final third and newly listed wastes.
 NWW = Non-wastewater
 WW = Wastewater

Gen/Trans/Treat/Store/Disp	Gen/Trans/Treat/Store/Disp	Gen/Trans/Treat/Store/Disp
F001* <u>X</u> / / / <u>X</u> /	F011* / / / / /	K037* / / / / /
F002* / / / / /	F012* / / / / /	K038* / / / / /
F003* / / / / /	<u>F019</u> / / / / /	K039* / / / / /
F004* / / / / /	F024* / / / / /	K040* / / / / /
F005* <u>X</u> / / / <u>X</u> /	K001* / / / / /	<u>K041</u> / / / / /
F020* / / / / /	K004 / / / / /	<u>K042</u> / / / / /
F021* / / / / /	K005 (NWW)* / / / / /	K043* / / / / /
F022* / / / / /	K007 (NWW)* / / / / /	K044* / / / / /
F023* / / / / /	K008 / / / / /	K045* / / / / /
F026* / / / / /	K009* / / / / /	K046
F027* / / / / /	K010* / / / / /	(NWW - nonreactive)* / / / / /
F028* / / / / /	K011(NWW)* / / / / /	<u>(NWW - reactive)</u> / / / / /
<u>Liquid Hazardous Wastes With:</u>	(WW) / / / / /	(WW) / / / / /
As* / / / / /	K013(NWW)* / / / / /	K047* / / / / /
(500 mg/l)	(WW) / / / / /	K048* / / / / /
Cd* / / / / /	K014(NWW)* / / / / /	K049* / / / / /
(100 mg/l)	(WW) / / / / /	K050* / / / / /
Cr VI* / / / / /	K015(WW)* / / / / /	K051* / / / / /
(500 mg/l)	K016* / / / / /	K052* / / / / /
Pb* / / / / /	<u>K017</u> / / / / /	K060(NWW)* / / / / /
(500 mg/l)	K018* / / / / /	(WW) / / / / /
Hg* / / / / /	K019* / / / / /	K061
(20 mg/l)	K020* / / / / /	(NWW - low zinc)* / / / / /
Ni* / / / / /	K021(NWW)* / / / / /	(NWW - high zinc)* / / / / /
(134 mg/l)	(WW) / / / / /	(WW) / / / / /
Se* / / / / /	K022(NWW)* / / / / /	K062* / / / / /
(100 mg/l)	(WW) / / / / /	K069
Ti* / / / / /	K023* / / / / /	(NWW - nonCaSO ₄)* / / / / /
(130 mg/l)	K024* / / / / /	<u>(NWW - CaSO₄)</u> / / / / /
pH* ≤ 2.0 / / / / /	K025(NWW)* / / / / /	(WW) / / / / /
PCBs* / / / / /	(WW) / / / / /	K071* / / / / /
≥ 50 ppm / / / / /	K027* / / / / /	<u>K073</u> / / / / /
<u>Hazardous Wastes with:</u>	K028* / / / / /	K083 (WW) / / / / /
HOCs* / / / / /	K029(NWW)* / / / / /	<u>K084</u> / / / / /
≥ 1,000 mg/l / / / / /	(WW) / / / / /	<u>K085</u> / / / / /
≥ 1,000 mg/kg / / / / /	K030* / / / / /	
F006 (NWW)* / / / / /	<u>K031</u> / / / / /	
(WW) / / / / /	<u>K035</u> / / / / /	
F007* / / / / /	K036* / / / / /	
F008* / / / / /		
F009* / / / / /		
F010* / / / / /		

	Gen/Trans/Treat/Store/Disp
786	
NWW -	
Sol Wash)*	
(WW -	
Sol Wash)*	
(NWW -	
Sol Sludge)	
(WW -	
Sol Sludge)	
(NWW -	
Caustic/Water	
(WW -	
Caustic/Water)	
K087*	
K093*	
K094*	
K095 (NWW)*	
(WW)	
K096 (NWW)*	
(WW)	
K097	
K098	
K099*	
K100 (NWW)*	
K101	
(NWW -	
low As)*	
(NWW -	
high As)	
(WW)*	
K102	
(NWW -	
low As)*	
(NWW -	
high As)	
(WW)*	
K103*	
K104*	
K105	
K106	
K113*	
K114*	
K115*	
K116*	
P001	
P002	
P003	
P004	

	Gen/Trans/Treat/Store/Disp
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P007	
P008	
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P011	
P012	
P013*	
P014	
P015	
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P020	
P021*	
P026	
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P030*	
P036	
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P039*	
P040*	
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P071*	
P072	
P074*	
P081	
P082	
P084	
P085*	

	Gen/Trans/Treat/Store/Disp
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P089*	
P092	
P094*	
P097*	
P098*	
P099*	
P102	
P104*	
P105	
P106*	
P107	
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P111*	
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U026	

Gen/Trans/Treat/Store/Disp

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Gen/Trans/Treat/Store/Disp

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U235°
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U248
U249

RCRA INTERIM STATUS INSPECTION FORM

Facility Name: AMERICAN STEEL FOUNDRIES
 Address: LAKE PARK BLVD & EDWINTON
SEBRING TWP.
 County: MAHONING

Date of Inspection July 3/5, 1990

HWFB #: _____

USEPA ID #: OH D 617-497-587

Facility Phone #: (216) 823-6150

At
Produce
Facility

Facility Contact: - Bill HESTAND, Safety & ENV. Supervisor
- Chuck Rued, Manager of Quality &

Facility Contact Phone #: _____

Safety Equipment #: _____

Inspector(s) Name(s): Ahmed Mustafa, OH D EPA
Kris CODER, Ohio EPA

ENV. Affairs & Terry BRADWAY, Facili.
ENG.

STATUS

Cond. Ex. SQG _____ SQG _____ Generator _____ Transporter _____ Treatment _____ Storage _____ Disposal X

ACTIVITIES

Containers _____ Tanks _____ Surface Impoundments _____ Incineration/Thermal treatment _____
 Waste pile _____ Land treatment _____ Landfill X Groundwater monitoring X
 Used oil burner _____ Hazardous waste fuel burner/blender _____

Y/N/NA REMARK #

1. Does the facility produce "discarded materials" as defined in 3745-51-02(A)? DISCARDED materials Generated at
2. Are they : Production Facility (OH D 981909418)
 - a. Abandoned (disposed; incinerated; accumulated, stored, or treated prior to disposal)? Y
 - b. Recycled? _____
 - c. Inherently waste-like? (F020, F021, F022, F023, F026, F028)? _____
3. If recycled or accumulated, treated or stored before recycling, is the waste:
 - a. Used in a manner constituting disposal? _____
 - b. Burned for energy recovery? _____
 - c. Reclaimed? (Refer to Table 1 of 3745-51-02) _____
 - d. Accumulated speculatively? _____
4. Is the material recycled by being:
 - a. Used or reused as an ingredient in an industrial process to make a product without prior reclamation? _____
 - b. Used as an effective substitute for commercial products? _____
 - c. Returned to the original process from which it was generated without prior reclamation as a substitute for a raw material feedstock? _____

	<u>Y/N/NA</u>	<u>REMARKS</u>
5. Are Land Disposal Restricted (LDR) wastes generated? If so, complete appropriate LDR checklist.	<u>N</u>	<u>_____</u>
6. Has the facility submitted a Part A application to Ohio EPA in accordance with OAC 3745-50-40?	<u>Y</u>	<u>_____</u>
7. If yes, is it complete and accurate and does it contain all information specified in OAC 3745-50-41, -42, -43?	<u>N</u>	<u>*</u>
8. If not accurate, has a Permit Change Request (PCR) been submitted in accordance with 3745-50-51? If yes, what date was the PCR submitted.	<u>NA</u>	<u>_____</u>
9. Is the facility operating in compliance with the terms and conditions of its HWFB permit?	<u>N</u>	<u>_____</u>
10. Has the facility submitted a Part B?	<u>N</u>	<u>_____</u>
11. Was advance notice of the inspection given? If so, how far in advance?	<u>Y</u>	<u>15 HOURS</u>

* According To June 12, 1989 Inspection :

ASF ~~WASTE~~ PART "A" was Submitted in NOV. 1980
 For ^{LANDFILL} DISPOSAL of Doo6 Waste.

IN June 1982, ASF Requested USEPA Withdra

PART "A" Application Based on their testing of
 Waste Stream. USEPA Acknowledges Request in
 APRIL 1983 Based on Information Submitted at that
 time.

- 2 -

Subsequent Sampling By USEPA Confirmed
 DISPOSAL OF HAZARDOUS Waste at this facility.

REMARKS. GENERAL INFORMATION.

Include list of wastes being generated/managed at the site and a brief description of site activity and waste handling.

CAC 3745-65-et seq. GENERAL FACILITY STANDARDS (40 CFR Part 265, SUBPART B)

		<u>Y/N/NA</u>	<u>REMARK #</u>
1.	Does the owner/operator (o/o) have a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by 3745-65-13(A)(1) (265.13(a))?	<u>Y</u>	_____
2.	Does o/o have a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. [3745-65-13(B)] (265.13(b))	<u>N</u>	_____
3.	a. Would physical contact with the waste structures or equipment injure unknowing/unauthorized person or livestock entering the facility? [3745-65-14(A)(1)] (265.14(a)(1))	<u>Y</u>	_____
	b. Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14(A)(2)] (265.14(a)(2))	<u>Y</u>	_____
IF BOTH 3A AND 3B ARE NO, MARK QUESTIONS 4 AND 5 NOT APPLICABLE.			
4.	Does the facility have -	<u>N</u>	_____
	a. A 24-hour surveillance system, or		
	b. An artificial or natural barrier <u>and</u> a means to control entry at all times [3745-65-14(B)(2)(a and b)] (265.14(b)(2))	<u>Y</u>	_____
5.	Does the facility have a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. [3745-65-14(C)] (265.14(c))	<u>Y</u>	_____
6.	a. Has the o/o developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. [3745-65-15] (265.15)	<u>N</u>	_____

b. Are areas subject to spills (i.e., loading and unloading areas, etc.) inspection daily when in use and according to other applicable regulations when not in use. [3745-65-16(B)(4)] (265.15(b)(4))

N _____

7. Has the o/o provided a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course? (265.16(a)(b)(c))

N _____

8. Does o/o keep all records required by 3745-65-16(D)(E) including written job titles, job descriptions and documented employee training records? (265.16(d)(e))

N _____

9. If Ignitable, Reactive or incompatible wastes are handled, does the facility meet the following requirements? [3745-65-17] (265.17)

- a. Protection from sources of ignition.
- b. Physical separation of incompatible waste materials.
- c. "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.
- d. Comingling of waste materials is done in a controlled, safe manner as prescribed by 3745-65-17(B) (265.17(b))

N/A _____

↓ _____

AC 3745-65 PREPAREDNESS AND PREVENTION (40 CFR PART 265 SUBPART C)

		Y/N/NA	REMARK #
1.	Is the facility operated to minimize the possibility of fire, explosion, or non-planned release of hazardous waste? [3745-65-31] (265.31)	<u>N</u>	
2.	Has there been a fire, explosion or <u>non-planned</u> release of waste at the facility?	<u>N</u>	
a.	If yes, has the contingency plan been implemented?		
3.	If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A)(B)(C)(D)] (265.32)	<u>NA</u>	
a.	Internal alarm system?	<u>Y</u>	*
b.	Access to telephone, radio or other device for summoning emergency assistance?	<u>NA</u>	
c.	Portable fire control equipment?	<u>NA</u>	
d.	Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers?	<u>NA</u>	
4.	Is all required spill control and decontamination equipment, fire and communications equipment tested and maintained as necessary? [3745-65-33] (265.33)	<u>N</u>	
5.	If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34] (265.34)	<u>Y</u>	Radios
6.	If required due to the actual hazards associated with the waste, is adequate aisle space to allow unobstructed movement of emergency or spill control equipment maintained? [3745-65-35] (265.35)	<u>NA</u>	
7.	If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with the possible hazards and the facility layout? [3745-65-37(A)] (265.37(a))	<u>NA</u>	

* Radios in Trucks.

8. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented. [3745-65-37(B)] (265.37(b))

NA

[illegible]

1. Does the o/o have a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes which contains the following components for the facility? [3745-65-52(A)(B)(C)(D)(E)] (265.52):

- a. Actions to be taken by personnel in the event of an emergency incident?
- b. Arrangements or agreements with local or state emergency authorities?
- c. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator?
- d. A list of all emergency equipment including location, physical description and outline of capabilities?
- e. If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52(F)] (265.52(f))?

2. Is a copy of the Contingency Plan and any plan revisions maintained on-site and has it been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan? [3745-65-53(A)(B)] (265.53)

3. Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54] (265.54)

4. Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the Contingency Plan designated at all times (on-site or on-call)? [3745-65-56(A-J)] (265.56)

5. If an emergency situation has occurred, has the emergency coordinator implemented all or part of the Contingency Plan and taken all of the actions and made all of the notifications deemed necessary under 3745-65-56(A-J). (265.56(a-j))

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* NO CONTINGENCY PLAN & NO EMERGENCY COORDINATOR FOR THIS SITE.

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

1. Does the o/o maintain a written operating record at the facility as required by 3745-65-73(A) (265.73) which contains the following information:

- a. Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date and method pertinent to such treatment, storage or disposal? [3745-65-73(B)(1)] (265.73(b)(1)).
- b. Common name, EPA Hazardous Waste Identification Number and physical state (solid, liquid, gas) of the waste?
- c. The estimated (or actual) weight, volume or density of the waste material?
- d. A description of the method(s) used to treat, store or dispose of the waste using the EPA handling codes listed in Table 2 of OAC 3745? (Part 265, Appendix I, Table 2)
- e. The present physical location of each hazardous waste within the facility?
- f. Records of incidents which require implementation of the Contingency Plan?
- g. FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document numbers? [3745-65-73(B)(2)] (265.73(b)(2)).
- h. Records of any waste analyses and trial tests required to be performed?
- i. Records of the inspections required under 3745-65-15 (265.15) (General Inspection Requirements)?
- j. Records of any monitoring, testing, or analytical data required under other Subparts as referenced by 3745-65-73(B)(6);(265.73(b)(6))?

- k. Records of closure cost estimates and post-closure (DISPOSAL ONLY) cost estimates required under OAC 3745-66 (Part 265 Subpart G)?

SEE CLOSURE
SECTION.

2. Has the o/o submitted an annual (biennial) Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under 3745-65-75 (265.75)?

N

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE ONLY TO OFF-SITE TSDS.

3. Are manifests received by the facility signed and dated? Is one copy given to the transporter, one copy sent to the generator within 30 days and one copy kept for at least 3 years? [3745-65-71(A)] (265.71)

N

N

- a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met [3745-65-71(B)] (265.71(b))?

NA

*

- b. Are any significant discrepancies in the manifest, as defined in 3745-65-72(A) (265.72(a)) noted in writing on the manifest document.

NA

4. Have any manifest discrepancies been reconciled within 15 days as required by 3745-65-72(B) (265.72(b)) or has the o/o submitted the required information to the Director/Regional Administrator?

NA

5. If the facility has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by 3745-65-76(A) (265.76) been submitted to the Director/Regional Administrator within 15 days?

N

* Shipping Papers and Manifest are NOT USED

OAC 3745-66 CLOSURE AND POST-CLOSURE (40 CFR PART 265. SUBPART G)

<u>Y/N/NA</u>	<u>REMARK #</u>

1. Is a written closure plan on file at the facility which contains the following elements: [3745-66-12] (265.112)?
 - a. A description of how each hazardous waste management unit will be closed in accordance with 265.111.
 - b. A description of how final closure will meet the requirements of 3745-66-11 (265.111).
 - c. An estimate of the maximum amount of hazardous waste ever in inventory.
 - d. A description of steps taken to remove or decontaminate facility equipment containment systems, structures, soils, and all hazardous waste residues.
 - e. The year closure is expected to begin and a schedule for the various phases of closure.
 - f. A description of other activities necessary to ensure closure with the performance standards including ground water monitoring, leachate collection, and run-off control.
2. Has the closure plan (and post-closure plan, if applicable) been amended 60 days prior to any changes in facility design, processes, or closure dates or 60 days after an unexpected event occurs which affects the closure plan? [3745-66-12(C)] (265.112(C))
3. Has the closure plan (and post-closure plan, if applicable) for surface impoundment, waste pile, land treatment or landfill units been submitted to the Director/Regional Administrator 180 days prior to beginning the closure process? [3745-66-12(D)] (265.112(d))
4. Has the closure plan (and post-closure plan, if applicable) for tank, containers storage or incinerator units been submitted to the Director/Regional Administrator 45 days prior to beginning the closure process? [3745-66-12(D)] (265.112(d))

A vertical line with an arrow at the bottom, labeled 'N' at the top, and a series of horizontal lines to its right.

NA *

NA

* Closure has NOT been Initiated or ~~intend to~~ ^{will be} at this time.

5. Within 90 days of receipt of the final volume of waste or Director's plan approval, if that is later, was all hazardous waste treated, removed, or disposed in accordance with the approved plan? [3745-66-13(A)] (265.113(a))
6. Was closure completed in accordance with the approved plan within 180 days after receipt of final volume of waste or approval of the plan, if that is later? [3745-66-13(B)] (265.113(b))
7. Did the owner/operator submit to the Director/Regional Administrator, within sixty (60) days after completion of closure, certification by both the owner/operator and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan? [3745-66-15] (265.115)
8. Did the owner/operator submit to the local zoning authority and the Director/Regional Administrator a survey plan in accordance with OAC 3745-66-16?
9. What permitted units at the facility have been closed in accordance with an approved Closure Plan?
10. If closure was partial, list the regulated units which remain in use at the facility:
11. If required, has the facility prepared a written post-closure plan? [3745-66-18] (265.118)
12. Does the post-closure plan include:
- A description of proposed ground water monitoring?
 - A description of planned maintenance activities?
 - The name, address and phone number of person/office to contact during the post-closure period?

NANANANANONENAN

13. For disposal facilities, has the owner/operator submitted to local land authorities and the Director a survey plat within 60 days after certification of closure? [3745-66-19] (265.119) NA _____

14. Has the owner of the property on which a disposal unit is located recorded on the deed that:

- a. The land has been used to manage hazardous waste and the type, quantity and location of waste? N _____
- b. Land use is restricted pursuant to 3745-66-17? N _____
[3745-66-19] (265.119)

General Operating Requirements. Does the facility provide the following:

- a. Run-on control capable of handling a 24-hr, 25-yr storm? [3745-68-02(A)] (265.302(a))
- b. Run-off control capable of handling a 24-hr, 25-yr storm? [3745-68-02(B)] (265.302(b))
- c. If run-off is hazardous waste, is it managed in accordance with applicable rules? [3745-68-02(B)]
- d. Are facilities associated with run-on and run-off control systems managed to maintain design capacity after rain events? [3745-68-02(C)] (265.302(c))
- e. Control of wind dispersal of hazardous waste? [3745-68-02(D)] (265.302(d))

N	

2. Surveying and Recordkeeping. Does the operating record include: [3745-68-09] (265.309)

- a. A map showing the exact location and dimensions of each cell? [3745-68-09(A)] (265.309(a))
- b. The contents of each cell and the location of each hazardous waste type within each cell? [3745-68-09(B)] (265.309(b))

N	
N	

3. Are ignitable or reactive wastes treated so the resulting mixture is no longer ignitable or reactive? [3745-68-12] (265.312(a)(b))

N/A	
-----	--

NOTE: IF WASTE IS RENDERED NON-REACTIVE OR NON-IGNITABLE, SEE TREATMENT REQUIREMENTS. IF NOT, THE PROVISIONS OF 3745-65-17 AND 3745-68-12(B) APPLY. (40 CFR 265.17(b))

		<u>Y/N/NA</u>	<u>REMARK #</u>
4.	Does the owner/operator dispose of incompatible wastes in separate cells? [3745-68-13] (265.313) If not, the provisions of 3745-68-15 apply. (265.17(b))	<u>NA</u>	
5.	Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill? [3745-68-15] (265.315)	<u>NA</u>	
6.	Are containers at least 90% full prior to placement in the landfill?	<u>NA</u>	*
7.	Is bulk or non-containerized liquid waste or waste containing free liquids treated so that free liquids are not longer present. [3745-68-14(A)] (265.314(a))	<u>N</u>	
8.	Are containers other than lab packs, ampules, batteries or capacitors holding free liquids placed in the landfill? [3745-68-14(B)] (265.314(b)) If yes, has all free liquid been removed, absorbed or otherwise eliminated?	<u>NA</u>	
9.	Has the owner/operator employed Method 9095 (Paint Filter Liquids Test) to demonstrate the absence of free liquids in containerized or bulk waste? [3745-68-14(D)] (265.314(d))	<u>N</u>	
10.	Are the special requirements for lab pack waste met? [3745-68-16] (265.316)	<u>NA</u>	
11.	Is a written closure/post-closure plan available for inspection at the facility? [3745-66-12] (265.112)	<u>N</u>	
12.	Has the closure/post-closure plan been amended 60 days prior to any changes in facility design, or operation, or no later than 60 days after an unexpected event has occurred which has effected the closure plan? [3745-66-18(D)](265.118(d))	<u>N</u>	

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* - Placement in the Landfill was in Bulk.

13. Has the closure/post-closure plan been submitted to the Director/
Regional Administrator 180 days prior to beginning closure?
[3745-66-18(E)] (265.118(e))
14. Does the plan contain information required in 3745-68-10? (265.310)
15. Is a closure cost estimate available?
16. Has closure begun?
17. Has the property owner attached a notation to the property deed
or other instrument which will notify any potential purchaser that
the property has been used to manage hazardous waste and future use
of the property is restricted under 3745-66-17(C) (265.117(c))
as required in 3745-66-19 (265.119(b))?

NA	
N	*

* No plan

(Production)

$$\frac{2}{2+3+5} / 90$$

Cond. Ex. SQG SQG Generator X Transporter Treatment Storage

ACTIVITIES		Incineration/Thermal treatment
✓	Asbestos	
	Surface Impoundments	

Containers X Tanks Surface impoundment
Waste pile Land treatment Landfill Groundwater monitoring

Waste pile Land treatment
Used oil burner Hazardous waste fuel burner/blender

N *

NA _____

1. Does the facility produce "discarded materials" as defined in 3745-51-02(A)?
2. Are they :
 - a. Abandoned(disposed;incinerated;accumulated, stored, or treated prior to disposal)?
 - b.Recycled?
 - c. Inherently waste-like?(F020,F021,F022,F023,F026,F028)?
3. If recycled or accumulated, treated or stored before recycling, is the waste:
 - a. Used in a manner constituting disposal?
 - b. Burned for energy recovery?
 - c. Reclaimed? (Refer to Table 1 of 3745-51-02)
 - d. Accumulated speculatively?
4. Is the material recycled by being:
 - a. Used or reused as an ingredient in an industrial process to make a product without prior reclamation?
 - b. Used as an effective substitute for commercial products?
 - c. Returned to the original process from which it was generated without prior reclamation as a substitute for a raw material feedstock?

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* The process of mixing sludge with Electric Arc Furnace Dust is No longer used.

Y/N/NA REMARKS

5. Are Land Disposal Restricted (LDR) wastes generated? If so, complete appropriate LDR checklist.
6. Has the facility submitted a Part A application to Ohio EPA in accordance with OAC 3745-50-40?
7. If yes, is it complete and accurate and does it contain all information specified in OAC 3745-50-41, -42, -43?
8. If not accurate, has a Permit Change Request (PCR) been submitted in accordance with 3745-50-51? If yes, what date was the PCR submitted.
9. Is the facility operating in compliance with the terms and conditions of its HWFB permit?
10. Has the facility submitted a Part B?
11. Was advance notice of the inspection given? If so, how far in advance?

Y	*
N	
NA	
↓	
N	**

* F - Solvent Wastes AND California List generated waste.

** SITE ENTRY TO CONDUCT THE INSPECTION WAS done with a Search Warrant. Officers Rick A. Perez and Timothy A. Swanson from the Office of the Sheriff of Stark County assisted in executing the Search Warrant to conduct an administrative inspection.

REMARKS. GENERAL INFORMATION.

Include list of wastes being generated/managed at the site and a brief description of site activity and waste handling.

WASTE Generated at the site, location.

- * F. Solvents (F001, F005) : due to Toluene and Water mix; and tetrachloroethylene. These Solvents are used in Parts & Equipment cleaning.

This waste is placed in 55 Gallon drums, which is placed in secondary containment.

There ~~is~~ is Two locations where this waste is accumulated. The first ~~one~~ location is outside north of the Power House and stored along with another drum that is labeled waste oil. The second location is South of the

B & E Building. The HAZ. waste drums is also stored w/ a waste oil drum within a ~~first~~ ^{second} like containment container. • NONE WAS DISPOSED since January, 1990.

- * ELC tric Arch BURNAGE DUST (D006-D008):

This predominantly cadmium & lead containing dust, which is collected in a (30) cubic yard container. This

- 3 -
container is sent to ENVIRITE, Canton, Ohio. It generated once every 10 days.

- * PART Cleaners (D001) is generated at time of pick up by Safety Kleen, Kent.

- * SMOKE EATER DUST (D005) it is generated from Welding operation where Barium accumulates in a pan then stored in a 55 Gallon Drum. No Disposal of this material since January of 1990.

3745-52 GENERATOR REQUIREMENTS (40 CFR Part 262)

Y/N/NA REMARK #

1. Have the wastes generated at this facility been evaluated as required under 3745-52-11 (262.11)? Y _____ *
2. Does this facility generate any hazardous wastes that are excluded from regulation under 3745-51-04 (261.4)? N _____
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment [3745-65-01] (265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit [3745-65-01] (265.1(c)(10))? N _____
4. Is the generator classified as a Small Quantity Generator (SQG) or conditionally exempt SQG? If so, complete appropriate checklist. N _____
5. Does the generator meet the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:
 - a. All hazardous wastes shipped off-site have been accompanied by a completed manifest using the most recently revised USEPA form 8700-22? Y _____
 - b. The manifest form used contains all the information required by 3745-52-20 (262.20) and the minimum number of copies required by 3745-52-22 (262.22)? Y _____
 - c. The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with 3745-52-20(C)(D)(E) (262.20)? Y _____
 - d. Prepared manifests have been signed by the generator and initial transporter in compliance with 3745-52-23(A)(1&2) (262.23)? Y _____
 - e. The generator has complied with manifest exception reporting requirements in 3745-52-42 (262.42(a))? NA _____
 - f. Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by 3745-52-40 (262.40)? Y _____

ASF

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to Evaluate Waste Type.

* Assumes Knowledge of waste and Previous testing It is definitely evaluated upon shipment to a TSD Facility for Treatment. The TSD Facility conduct the testing to confirm Waste Identification. Yet the facility has no Waste Analysis Plan.

6. Does the generator meet the following hazardous waste pre-transport requirements: _____

a. Prior to offering hazardous wastes for transport off-site, the waste material is packaged, labeled, and marked in accordance with applicable DOT regulations [3745-52-30, 3745-52-31, and 3745-52-32] (262.30, 262.31, 262.32)? Y

b. Prior to offering hazardous waste for transport off-site, each container with a capacity of 110 gallons or less is affixed with a completed hazardous waste label as required by 3745-52-32 (262.32)? Y

c. Prior to offering hazardous wastes for transport off-site, the generator meets requirements for properly placarding or offering to properly placard for the initial transporter of the waste material in compliance with 3745-52-33 (262.33)? N *

7. Does the generator import or export hazardous waste? _____

If so, are the wastes handled in accordance with the requirements of 3745-52-50 (262.50)? N

8. If the generator elects to accumulate hazardous waste on-site in containers or tanks for 90 days or less without a hazardous waste facility installation and operation permit as provided under 3745-52-34 (262.34), are the following requirements with respect to such accumulation met:

a. The containers or tanks are clearly marked with the words "Hazardous Waste"? N

b. The date that accumulation began is clearly marked on each container? N

c. If the waste is accumulated in containers, the generator is complying with OAC 3745-66-70 to 3745-66-77? Complete Management of Containers checklist. SEE Management of Containers Check List

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* Doob/Doob8 Does NOT NEED A Placard, But F-Solvent Waste Should have a placard (ASF does have it).

- d. If the waste is accumulated in tanks, the generator is complying with OAC 3745-66-90, to 3745-66-992 except OAC 3745-66-97(C) and 3745-66-991? Complete Storage and Treatment in Tanks checklist.
- e. If the generator accumulates waste at or near the point of generation which is under the control of the operator of the process generating the waste as allowed by 3745-52-34(C) are the following requirements met:
1. Quantities of waste accumulated do not exceed 55 gallons at any time?
 2. Quantities of acutely hazardous waste accumulated do not exceed 1 quart at any one time?
 3. If the generator is accumulating hazardous waste in accordance with e.1 or e.2, above, has the generator marked the containers with words "Hazardous Waste" or with other words identify the contents of the container and is the generator complying with OAC 3745-66-71, 3745-66-72, 3745-66-73(A), 3745-66-76, and 3745-66-77?
 4. If the generator accumulates hazardous wastes in excess of the amounts listed in either e.1 or e.2, above, did the generator comply with 3745-52-34(A) (262.34(a)) within three (3) days and mark the container holding the excess accumulation with the date the excess accumulation began accumulating?
9. Has the generator accumulated hazardous wastes in excess of ninety (90) days?
10. Has the generator been granted an extension by the Director/Regional Administrator for accumulation in excess of ninety (90) days?
11. Has the generator treated, stored, disposed of, transported or offered for transportation hazardous waste without having obtained a USEPA identification number from the Administrator as required under 3745-52-12 (262.12)?

NA.

NA

Y

N

N

12. Does the generator provide a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) (265.16) including instruction in safe equipment operation and emergency procedures, training new employees within 6 months and providing an annual training program refresher course? [3745-52-34(A)(4)] (262.34) N
13. Does the generator keep all of the records required by 3745-65-16(D)(E) (265.16) including written job titles, job descriptions and documented employee training records? [3745-52-34(A)(4)] (262.34) N
14. Has the generator filed annual reports on or before March 1st of the next calendar year as required by 3745-52-41? Y
15. Does the generator comply with the applicable requirements for owners or operators of hazardous waste facilities? Complete "Preparedness and Prevention" and "Contingency Plan and Emergency Procedures" checklists. _____

REMARKS. GENERATOR REQUIREMENTS

Y/N/NA REMARK #

1. Does the owner/operator (o/o) have a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by 3745-65-13(A)(1) (265.13(a))? Y _____
2. Does o/o have a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. [3745-65-13(B)] (265.13(b)) N _____
3. a. Would physical contact with the waste structures or equipment injure unknowing/unauthorized person or livestock entering the facility? [3745-65-14(A)(1)] (265.14(a)(1)) Y _____
 b. Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14(A)(2)] (265.14(a)(2)) Y _____

IF BOTH 3A AND 3B ARE NO, MARK QUESTIONS 4 AND 5 NOT APPLICABLE.

4. Does the facility have -
 a. A 24-hour surveillance system, or
 b. An artificial or natural barrier and a means to control entry at all times [3745-65-14(B)(2)(a and b)] (265.14(b)(2)) Y _____
Y _____
5. Does the facility have a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. [3745-65-14(C)] (265.14(c)) Y _____
6. a. Has the o/o developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. [3745-65-15] (265.15) Y *

* ~~The~~ Operating Record Log began Feb. 6, 1990.

b. Are areas subject to spills (i.e., loading and unloading areas, etc.) inspection daily when in use and according to other applicable regulations when not in use. [3745-65-15(B)(4)] (265.15(b)(4))

Y _____

7. Has the o/o provided a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course? (265.16(a)(b)(c))

N SEE Page #7

8. Does o/o keep all records required by 3745-65-16(D)(E) including written job titles, job descriptions and documented employee training records? (265.16(d)(e))

N SEE Page #7

9. If Ignitable, Reactive or incompatible wastes are handled, does the facility meet the following requirements? [3745-65-17] (265.17)

- a. Protection from sources of ignition.
- b. Physical separation of incompatible waste materials.
- c. "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.
- d. Comingling of waste materials is done in a controlled, safe manner as prescribed by 3745-65-17(B) (265.17(b))

Y _____
Y _____
N _____ *
N _____ * *

* Poly pack containers which contain 55 Gallon Drums, do NOT have these signs.

* * There is a possibility of F- Solvent being mixed with oil AT the Power House poly pack container. # Samples ^{we} ~~was~~

From the oil & solvent Drum 24

obtained on 7/2/90, which will confirm this (Samples # ASF

S #1 & S #2)

3745-65 PREPAREDNESS AND PREVENTION (40 CFR PART 265 SUBPART C)

		Y/N/NA	REMARK #
1.	Is the facility operated to minimize the possibility of fire, explosion, or non-planned release of hazardous waste? [3745-65-31] (265.31)	<u>Y</u>	_____
2.	Has there been a fire, explosion or non-planned release of waste at the facility? a. If yes, has the contingency plan been implemented?	<u>N</u>	_____
3.	If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A)(B)(C)(D)] (265.32)	<u>Y</u>	_____
a.	Internal alarm system?	<u>Y</u>	_____
b.	Access to telephone, radio or other device for summoning emergency assistance?	<u>Y</u>	_____
c.	Portable fire control equipment?	<u>Y</u>	_____
d.	Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers?	<u>Y</u>	_____
4.	Is all required spill control and decontamination equipment, fire and communications equipment tested and maintained as necessary? [3745-65-33] (265.33)	<u>Y</u>	_____
5.	If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34] (265.34)	<u>Y</u>	Radio's _____
6.	If required due to the actual hazards associated with the waste, is adequate aisle space to allow unobstructed movement of emergency or spill control equipment maintained? [3745-65-35] (265.35)	<u>N</u>	_____
7.	If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with the possible hazards and the facility layout? [3745-65-37(A)] (265.37(a))	<u>Y</u>	_____ *

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* The Fire Department conduct a Walk Thru of the facility on Sept. 11, 1989. ^{However} ASF did not make appropriate arrangements and agreements w/ STATE Emergency Authorities (OSPA-B.

8. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented. [3745-65-37(B)] (265.37(b))

N

1. Does the o/c have a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes which contains the following components for the facility? [3745-65-52(A)(B)(C)(D)(E)] (265.52):
 - a. Actions to be taken by personnel in the event of an emergency incident? Y _____
 - b. Arrangements or agreements with local or state emergency authorities? N _____ *
 - c. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator? N _____ **
 - d. A list of all emergency equipment including location, physical description and outline of capabilities? N _____
 - e. If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52(F)] (265.52(f))? N _____ ***
2. Is a copy of the Contingency Plan and any plan revisions maintained on-site and has it been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan? [3745-65-53(A)(B)] (265.53) N _____ *O EPA-ER Did not Receive copy*
3. Is the plan revised in response to rule changes, ^{F-Solvents} facility, equipment and personnel changes or failure of the plan? [3745-65-54] (265.54) Y _____ *will revised ago*
4. Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the Contingency Plan designated at all times (on-site or on-call)? [3745-65-56(A-J)] (265.56) Y _____
5. If an emergency situation has occurred, has the emergency coordinator implemented all or part of the Contingency Plan and taken all of the actions and made all of the notifications deemed necessary under 3745-65-56(A-J). (265.56(a-j)) NA _____

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* ASF did not make agreements and arrangements with Ohio EPA - ER (Emergency Authorities) and Local Authorities

** Emergency Coordinator's Home & Work Addresses were NOT Included in the contingency plan

*** No Evacuation plan for Facility Personnel at ^{less than 90 day} Drum Storage Area, which appears ^{to be the} ~~that~~ only applicable area ^{that} is deficient.

3745-65 MANIFEST SYSTEM/RECORDS/REPORTING (40 CFR PART 265, SUBPART E)

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

		<u>Y/N/NA</u>	<u>REMARK #</u>
1.	Does the o/o maintain a written operating record at the facility as required by 3745-65-73(A) (265.73) which contains the following information:		
a.	Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date and method pertinent to such treatment, storage or disposal? [3745-65-73(B)(1)] (265.73(b)(1)).	<u>N</u>	<u>*</u>
b.	Common name, EPA Hazardous Waste Identification Number and physical state (solid, liquid, gas) of the waste?	<u>N</u>	<u>*</u>
c.	The estimated (or actual) weight, volume or density of the waste material?	<u>N</u>	<u>*</u>
d.	A description of the method(s) used to treat, store or dispose of the waste using the EPA handling codes listed in Table 2 of OAC 3745? (Part 265, Appendix I, Table 2)	<u>N</u>	
e.	The present physical location of each hazardous waste within the facility?	<u>N</u>	<u>Address the Drum Storage Area</u>
f.	Records of incidents which require implementation of the Contingency Plan?	<u>NA</u>	
g.	FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document numbers? [3745-65-73(B)(2)] (265.73(b)(2))	<u>NA</u>	
h.	Records of any waste analyses and trial tests required to be performed?	<u>NA</u>	
i.	Records of the inspections required under 3745-65-15 (265.15) (General Inspection Requirements)?	<u>↓</u>	
j.	Records of any monitoring, testing, or analytical data required under other Subparts as referenced by 3745-65-73(B)(6);(265.73(b)(6))?	<u>↓</u>	

* A Tracking Log of the Quantity and description for 1990, ^{on}

[illegible]

- [illegible]

[illegible]

1. Is a written closure plan on file at the facility which contains the following elements: [3745-66-12] (265.112)?
 - a. A description of how each hazardous waste management unit will be closed in accordance with 265.111.
 - b. A description of how final closure will meet the requirements of 3745-66-11 (265.111).
 - c. An estimate of the maximum amount of hazardous waste ever in inventory.
 - d. A description of steps taken to remove or decontaminate facility equipment containment systems, structures, soils, and all hazardous waste residues.
 - e. The year closure is expected to begin and a schedule for the various phases of closure.
 - f. A description of other activities necessary to ensure closure with the performance standards including ground water monitoring, leachate collection, and run-off control.
2. Has the closure plan (and post-closure plan, if applicable) been amended 60 days prior to any changes in facility design, processes, or closure dates or 60 days after an unexpected event occurs which affects the closure plan? [3745-66-12(C)] (265.112(C))
3. Has the closure plan (and post-closure plan, if applicable) for surface impoundment, waste pile, land treatment or landfill units been submitted to the Director/Regional Administrator 180 days prior to beginning the closure process? [3745-66-12(D)] (265.112(d))
4. Has the closure plan (and post-closure plan, if applicable) for tank, containers storage or incinerator units been submitted to the Director/Regional Administrator 45 days prior to beginning the closure process? [3745-66-12(D)] (265.112(d))

[illegible]

* Closure plan has not been written or ~~action~~
has ~~not~~ been initiated at this time.

5. Within 90 days of receipt of the final volume of waste or Director's plan approval, if that is later, was all hazardous waste treated, removed, or disposed in accordance with the approved plan? [3745-66-13(A)] (265.113(a))
6. Was closure completed in accordance with the approved plan within 180 days after receipt of final volume of waste or approval of the plan, if that is later? [3745-66-13(B)] (265.113(b))
7. Did the owner/operator submit to the Director/Regional Administrator, within sixty (60) days after completion of closure, certification by both the owner/operator and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan? [3745-66-15] (265.115)
8. Did the owner/operator submit to the local zoning authority and the Director/Regional Administrator a survey plan in accordance with OAC 3745-66-16?
9. What permitted units at the facility have been closed in accordance with an approved Closure Plan?
10. If closure was partial, list the regulated units which remain in use at the facility:
11. If required, has the facility prepared a written post-closure plan? [3745-66-18] (265.118)
12. Does the post-closure plan include:
- A description of proposed ground water monitoring?
 - A description of planned maintenance activities?
 - The name, address and phone number of person/office to contact during the post-closure period?

NA

NONE

N/A

NA

NA

13. For disposal facilities, has the owner/operator submitted to local land authorities and the Director a survey plat within 60 days after certification of closure? [3745-66-19] (265.119) NA

14. Has the owner of the property on which a disposal unit is located recorded on the deed that:

- a. The land has been used to manage hazardous waste and the type, quantity and location of waste? ✓
- b. Land use is restricted pursuant to 3745-66-17? ✓
[3745-66-19] (265.119)

		Y/N/NA	REMARK #
1.	Are hazardous wastes stored in containers which are:	<u>N</u>	
a.	Closed [3745-66-73(A)] (265.173)?	<u>Y</u>	
b.	In good condition [3745-66-71] (265.171)?	<u>Y</u>	
c.	Compatible with the wastes stored in them [3745-66-72] (265.172)?	<u>Y</u>	
2.	Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)] (265.173(a))	<u>N</u>	
3.	Are hazardous waste containers stored, handled and opened in a manner which prevents container rupture or leakage? [3745-66-73(B)] (265.173(b))	<u>Y</u>	*
4.	Is the area where containers stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74] (265.174) [documentation of inspections required under 3745-65-15 for TSDs]	<u>N</u>	
5.	Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] (265.176)	<u>Y</u>	
6.	Are containers holding hazardous wastes stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] (265.177(c))	<u>Y</u>	

* A poly Pack container contains (2) 55 Gallon Drums, and acts as a secondary containment.

Facility: American Steel Foundries (ASF)
 U.S. EPA I.D. No. : OH 981 909 4/8
 Street: 1001 E. Broadway St.
 City: Alliance State: OH Zip: 44601
 Telephone: (216) 823-6150

Owner/Operator:
 Street: 205 N. Michigan
 City: Chicago State: IL Zip: 60601
 Telephone: _____

Inspection Date: 7/5+6/90 Time: 4:00 pm & 9:00 am
 Weather Conditions: Cloudy Temp. 80°F, Overcast 72°F

	<u>Name</u>	<u>Agency/Title</u>	<u>Telephone</u>
Inspectors:	<u>Ahmed Mustafa</u>	<u>OEPA-NEDO/ENV. Eng.</u>	<u>(216)-425-9171</u>
	<u>Mark Bergman</u>	<u>OEPA-NEDO/ENV. Eng.</u>	<u>(216)-425-9171</u>
Facility Representative:	<u>Bill HEGSTAND</u>	<u>SAFETY</u>	_____

	<u>Generate</u>	<u>Transport</u>	<u>Treat</u>	<u>Store</u>	<u>Dispose</u>
F-Solvent	<u>X</u>	_____	_____	<u>X</u>	_____
Dioxin	_____	_____	_____	_____	_____
California List	<u>X</u>	_____	_____	_____	_____
First Third	_____	_____	_____	_____	_____
Second Third	_____	_____	_____	_____	_____

INSPECTION SUMMARY

Processes That Generate LDR Wastes

- PARTS cleaning Solvents, consisting of Toluene and Tetrachloroethylene and Pentachloroethylene. The waste generated is coded as F001 & F005
- PARTS cleaning Naphtha, it is used ~~as a~~ ^{to clean} part and Remains captive in a product form until removed by Safety Kleen as a waste, ~~which~~ ^{which} is coded D001.

LDR Waste Management

F001 & F005 are accumulated in 55 Gallon Drums and Sent to ~~Safety Kleen~~ Safety Kleen, New Castle, KY for Reclamation.

D001 is generated ~~at~~ ^{at} the time Safety Kleen pickup the spent product from the container, It is sent to Safety Kleen, Kent, Ohio.

Summary

- ASF generates Non-Waste Water D005, D006, & D008 Which are NOT a subject of LDR, until August 1990.
- ASF uses LDR Forms and complete up to date

RCRA LAND DISPOSAL RESTRICTION INSPECTION

WASTE IDENTIFICATION

1. Does the facility handle the following wastes?

a. F001 through F005 spent solvents

Yes ☒ No ☐ List* F001 & F005 only

b. Dioxin-containing Wastes

Yes ☐ No ☒ List* _____

c. California List Wastes

Yes ☒ No ☐ List* D001

d. First and Second Third Wastes

Yes ☐ No ☒ List* _____

* List wastes if room allows or attach Appendix A.

Note: Please be aware of potential misclassification of wastes (i.e., California list/"soft hammer"/characteristic waste applicabilities).

2. Does the facility handle the following wastes (national capacity variances)?

a. F001 - F005 contaminated soil or debris resulting from a CERCLA response action or RCRA corrective action (effective date — 11/08/90).

Yes ☐ No ☒ Comments _____

b. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (effective date — 11/08/90).

Yes ☐ No ☒ Comments _____

c. California list contaminated soil or debris resulting from a CERCLA response action or a RCRA corrective action (effective date — 11/08/90).

Yes ☐ No ☒ Comments _____

- d. First Third wastes with the following waste codes: K048, K049, K050, K051, K052, or K071 (effective date - 08/08/90).

Yes ☐ No ☒ Comments _____

- e. First Third contaminated soil and debris which have a treatment standard based on incineration - K016, K018, K019, K020, K022, K024, K030, K037, K048-K052, K086, K087, K101, K102, K103, and K104 (effective date - 08/08/90).

Yes ☐ No ☒ Comments _____

- f. Second Third contaminated soil and debris which have a treatment standard based on incineration - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U109, U221, U223, U235 (effective date - 06/08/91).

Yes ☐ No ☒ Comments _____

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

Yes ☒ No ☐ NA ☐

If yes, check the appropriate treatability group.

☐ Wastewaters containing solvents (less than or equal to 1% total organic carbon (TOC) by weight)
☒ All other spent solvent wastes

2. First and Second Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

Yes ☐ No ☐ NA ☒

If yes, list the waste code and check the correct treatability group.

Waste Code	Wastewater*	Non-wastewater
_____	_____	_____
_____	_____	_____
_____	_____	_____

* Less than 1% TOC by weight and less than 1% filterable solids.

3. California List Wastes: Has the generator correctly identified the required treatment technology [268.42]?

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

Yes ☐ No ☐ NA ☒

If yes, specify the method: _____

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated [40 CFR 761.70] or disposed of by other approved alternate methods [40 CFR 761.60(e)]?

Yes ☐No ☐NA ☒

If an alternative method is used, specify the method and state whether the facility has received approval from the Regional Administrator or Director, Exposure Evaluation Division, for an exemption from the incineration requirement:

- c. For hazardous waste that contains halogenated organic compounds (HOCs) in total concentrations greater than or equal to 1,000 mg/L or 1,000 mg/Kg (except dilute HOC wastewater), is the waste incinerated in accordance with existing requirements of 40 CFR Part 264 Subpart O or 40 CFR Part 265 Subpart O?

Yes ☒No ☐NA ☐

4. Does the generator mix restricted wastes with different treatment standards?

Yes ☐No ☒Comments

If yes, did the generator select the most stringent treatment standards (268.41(b), 268.43(b))?

Yes ☐No ☐Comments

B. Waste Analysis

1. Does the generator determine whether the restricted waste exceeds treatment standards or prohibition levels at the point of generation by:

-

Knowledge of waste

Yes ☒No ☐

List the wastes for which "applied knowledge" was used and describe the basis of the applied knowledge determination.

* Pool 1: The use of MSDS Forms, which is given to ASF by Safety

Kleen.

* Pool 2 & Pool 5: By knowledge of the process, then tested to confirm.

Was all supporting data retained on-site, [268.7(a)(5)]?

Yes ☒ No ☐

- TCLP Yes ☐ No ☐ NA ☒

List the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- Total constituent analysis Yes ☒ No ☐ NA ☐

List the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

Dool, Fool, Foos * 4/3/1990 * As generated and
shipped to safety Kleen.

- pH \leq 2 Yes ☐ No ☐ NA ☒

List the wastes for which pH testing was used.

- Paint Filter Liquid Test Yes ☐ No ☐ NA ☒

List the wastes for which PFLT was used.

2. Does the facility dilute the restricted waste as a substitute for adequate treatment [268.3]?

Yes ☐ No ☐ NA ☐

C. Management

1. On-Site Management

Is restricted waste treated, stored for greater than 90 days, or disposed on-site?

Yes ☒ No ☐ Comments F-solvent ^{is} stored on site since Dec. 20

If yes, the TSD Checklist must be completed.

2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

Yes ☒ No ☐ (If no, go to b)

If yes, identify waste code and off-site treatment or storage facilities:

Waste Code	Facilities	Treat/Store
D001	Safety Kleen, Kent, Oh	Store
F001	Safety Kleen, Newcastle, KY	Treat
F005		

- Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

Yes ☒ No ☐

- Does notification contain the following?

EPA Hazardous waste number(s) Yes ☒ No ☐

Applicable treatment standards and prohibition levels Yes ☒ No ☐

Manifest number Yes ☒ No ☐

Waste analysis data, if available Yes ☒ No ☐

- b. Does the facility ship any waste that meets the treatment standards to an off-site disposal facility?

Yes ☒ No ☐ (If no, go to c)

If yes, identify waste code and off-site disposal facilities:

Waste Code	Facility
D001 [Combustible Liquid] RQ WASTE OIL	Safety Kleen, Kent, Ohio

- Does the facility provide notification and certification to the disposal facility [268.7(a)(2)]?

Yes ___ No ___

- Does notification contain the following?

EPA Hazardous waste number(s) Yes ___ No ___

Applicable treatment standards and prohibition levels Yes ___ No ___

Manifest number Yes ___ No ___

Waste analysis data, if available Yes ___ No ___

Certification that the waste meets treatment standards [wording in 268.7(a)(2)(ii)] Yes ___ No ___

- c. Is the waste subject to a nationwide variance, case-by-case extension (268.5), or no migration petition (268.6).

Yes ___ No X (If no, go to d)

- If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

Yes ___ No ___

- Does the notification contain the following information?

EPA hazardous waste number Yes ___ No ___

The corresponding treatment standards and all applicable prohibitions Yes ___ No ___

Manifest number Yes ___ No ___

Waste analysis data, if available Yes ___ No ___

Date the waste is subject to the prohibitions Yes ___ No ___

- d. Does the facility generate any First or Second Third "soft hammer" waste?

Yes ___ No ___

NA
(If no, go to 4)

NA

Does the generator provide the following notification to the receiving facility with each shipment of waste [268.7(a)(4)]?

- (i) EPA hazardous waste number Yes ☐ No ☐
- (ii) Applicable prohibition [268.33(f), 268.34(h)] Yes ☐ No ☐
- (iii) Manifest number Yes ☐ No ☐
- (iv) Waste analysis data, if available Yes ☐ No ☐

3. "Soft Hammer" Demonstrations/Certifications

a. Are any "soft hammer" wastes or treatment residues destined for ultimate disposal in a landfill or surface impoundment?

Yes ☐ No ☐

b. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?

Yes ☐ No ☐

c. Has the generator submitted a demonstration and certification to the Regional Administrator to document its efforts to locate practically available treatment [268.8(a)(2)]?

Yes ☐ No ☐

- If yes, did the generator submit the documentation and certification prior to first shipment?

Yes ☐ No ☐

d. Does the demonstration contain the following information?

A list of facilities and facility officials contacted?

Yes ☐ No ☐

Addresses

Yes ☐ No ☐

Telephone numbers

Yes ☐ No ☐

Contact dates

Yes ☐ No ☐

Certification statement

Yes ☐ No ☐

NA

Attach a copy of the demonstration and certification.

- e. If there is no practically available treatment, has the generator included with the demonstration, a written discussion of why the generator was not able to obtain treatment or recovery for that waste [268.8(a)(2)(i)]?

Yes ☐ No ☐ NA ☐

If yes, attach a copy of written discussion.

- f. Does the generator ship its "soft hammer" waste off-site for treatment?

Yes ☐ No ☐

Describe the type of treatment and treatment facilities:

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Facility</u>
<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>

- g. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

Yes ☐ No ☐

- h. Does the generator provide certification with each subsequent shipment of wastes to receiving facilities?

Yes ☐ No ☐ NA ☐

4. Records Retention

Does the facility retain on-site copies of all notifications, demonstrations, and certifications for a period of 5 years [268.7(a)(6)]?

Yes ☒ No ☐ Comments LDR Notifications begun Dec. 1989.

D. RCRA Corrective Action and CERCLA Response Action Waste *NA*

1. ~~Has the facility disposed of contaminated soil and debris from a RCRA corrective action or a CERCLA response action in a landfill or surface impoundment?~~

~~Yes ___ No ___ Comments _____~~

2. ~~Did the unit meet the minimum technology requirements (double liner, leachate collection system, and ground-water monitoring)?~~

~~Yes ___ No ___ NA ___ Comments _____~~

E. Treatment Using RCRA 264/265 Exempt Units or Processes *NA*

1. ~~Is waste treated in RCRA 264/265 exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?~~

~~Yes ___ No ___~~

~~List types of waste treatment units and processes:~~

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Units and Processes</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

2. ~~Are treatment residuals generated from these units?~~

~~Yes ___ No ___ Comments _____~~

~~If yes, the residues are subject to the LDR generator requirements.~~

3. ~~Are these residuals further treated, stored for greater than 90 days, or disposed on-site?~~

~~Yes ___ No ___ NA ___ Comments _____~~

~~If yes, the TSD checklist must be completed.~~

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TRANSPORTER CHECKLIST

NA

TRANSPORTER REQUIREMENTS

- A. Does the transporter accumulate waste for more than 10 days [268.50(a)(3)]?

Yes ☐ No ☐

If yes, check the appropriate regulatory status:

☐ Interim status for storage
☐ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days:

- B. Does the transporter mix, combine, or recontainerize wastes?

Yes ☐ No ☐

If yes, list the restricted wastes that have been mixed.

- C. Is the waste treated in an exempt treatment process on-site?

Yes ☐ No ☐

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264/265.13]?

F-solvent (TCLP)* Yes ___ No X NA ___

Dioxin (TCLP) Yes ___ No ___ NA X

California List (PFLT and/or total constituent analysis)* Yes ___ No X NA ___

First & Second Third (TCLP and/or total constituent analysis) Yes ___ No ___ NA X

* TCLP= Toxicity Characteristic Leaching Procedure (268, App. I)
PFLT= Paint Filter Liquids Test (SW-846)

* ASF Does NOT
Have a Waste
Analysis Plan

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

Yes X No ___ Comments This is Done thru Safety Kleen prior to shipment

a. What date was the waste analysis plan last revised? NA

No Analysis Plan.

b. Are analyses conducted on-site or off-site?

___ On-site X Off-site

Identify off-site lab: Safety Kleen, Elgin, IL

c. Are F-solvent and dioxin containing waste analyzed using TCLP?

Yes ___ No X NA ___

- d. Are California List wastes analyzed using the appropriate analytical method (PFLT filtrate for metals and cyanide; total constituent analysis for corrosive wastes, PCBs and halogenated organic compounds (HOCs)).

Yes ☒ No ☐ NA ☐

- e. Are First Third and Second Third wastes analyzed using the appropriate analytical method for the specified EDAT* (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)? See Appendix B.

Yes ☐ No ☐ NA ☒

* EDAT= best demonstrated available technology

3. Are the operating records, including analyses and quantities, complete [264/265.73]?
 Yes ☐ No ☒ ** It is done on Drum Storage area (unpermitted) polyPack containers which contained less than 90 DAYS DRUMS (HAZARDOUS).*
4. Do operating records contain copies of the notification, certification, and demonstration (if applicable) from the generator? Records must be kept until closure of unit.

Yes ☒ No ☐ Comments No Permitted Units on-Site.

B. Storage (268.50)

1. Are prohibited wastes* stored on-site?

Yes ☐ No ☒ (If no, go to C, Treatment.)

* Prohibited wastes are a subset of restricted wastes, i.e., they are those restricted wastes that are currently ineligible for land disposal [53 FR 31208, August 17, 1988].

2. If yes, identify storage unit.

~~_____ Tanks
 _____ Containers
 _____ Other (Identify inappropriate storage unit(s)._____)~~

3. Are all containers clearly marked to identify the contents and date(s) entering storage [268.50(a)(2)]?

Yes ☐ No ☐ NA ☐

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage (264/265.73)?

Yes ___ No ___

5. Do operating records agree with container labeling [268.50(a)(2) and 264/265.73]?

Yes ___ No ___ NA ___

6. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

Yes ___ No ___ NA ___

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is greater than the tank volume?

Yes ___ No ___

7. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record [268.50(a)(2)]?

Yes ___ No ___ NA ___

8. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect [268.50(c)]?

Yes ___ No ___ NA ___

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

Yes ___ No ___ NA ___

If yes, state how: _____

9. Has liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm being stored:

- a. In a facility meeting the TSCA criteria in 761.65(b)?

Yes ___ No ___ NA ___

- b. More than one year [268.50(f)]?

Yes ___ No ___ NA ___

C. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

Yes ☐ No ☐ (If No, go to D, Surface Impoundments.)

2. Describe the waste codes and treatment processes:

<u>Waste Code</u>	<u>Treatment Processes</u>
_____	_____
_____	_____
_____	_____

3. Was dilution used as a substitute for treatment [268.3]?

Yes ☐ No ☐ Comments _____

4. Does the facility, in accordance with an acceptable waste analysis plan, test the residue from all treatment processes [268.7(b)]?

Yes ☐ No ☐ Comments _____

Have treatment standards or prohibition levels been met?

Yes ☐ No ☐ Comments _____

5. Does the facility ship any waste or treatment residue to an off-site disposal facility?

Yes ☐ No ☐ NA ☐

If yes, does the treatment facility provide notification and certification to the disposal facility [268.7(b)(4) and (5)]??

Yes ☐ No ☐ (If yes, the Generator portion of the checklist must be completed.)

6. If the waste or treatment residue will be further managed at a different treatment or storage facility, has the facility complied with the generator notice and certification requirements [268.7(a)]?

Yes ☐ No ☐

7. Does the facility treat "soft hammer" wastes?

Yes ___ No ___ (If no, go to 8.)

a. If yes, is the waste treated in accordance with the generator's certification/demonstration [268.8(c)(1)]?

Yes ___ No ___

b. Did the treatment facility certify that the "soft hammer" waste was treated in accordance with the generator's demonstration, [268.8(c)(1)]?

Yes ___ No ___

8. Does the facility ship any "soft hammer" waste to an off-site treatment, recovery, disposal or storage facility?

Yes ___ No ___ NA ___

If yes, does the treatment facility send a copy of the generator's "soft hammer" demonstration and certification to the receiving treatment, recovery, disposal or storage facility along with its treatment certification [268.8(c)(2)]?

Yes ___ No ___ NA ___

Identify waste codes and off-site facilities:

Waste Code

Facility

9. Are notifications, demonstrations, certifications (if applicable), and results of waste analysis prepared by the generators, kept in the operating record until facility closure [264/265.73(b)]?

Yes ___ No ___

D. Surface Impoundments

1. Are prohibited wastes placed in surface impoundments for treatment?
Yes ___ No ___ List _____ (If no, go to E, Land Disposal.)
2. Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment?
Yes ___ No ___
3. Did the facility submit to the Agency, the waste analysis plan, as well as, the certification of compliance with minimum technology and ground-water monitoring requirements?
Yes ___ No ___
4. If the minimum technology requirements have not been met, has a waiver been granted for that unit?
Yes ___ No ___ NA ___
5. Have the Subpart F groundwater monitoring requirements been met?
Yes ___ No ___ NA ___
6. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?
Yes ___ No ___
Attach test results.
7. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 40 CFR 268, or where no treatment standards are established for a waste, the applicable prohibition levels?
Sludge Yes ___ No ___ Waste Code _____
Supernatant Yes ___ No ___ Waste Code _____
8. Provide the frequency of analyses conducted on treatment residues:

NA

TSD

9. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268?

Yes ___ No ___

10. Are sludge residues that exceed the treatment standards and/or prohibition levels removed adequately on an annual basis?

Yes ___ No ___ Comments _____

- a. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

Yes ___ No ___

- b. Are residues subsequently managed in another surface impoundment?

Yes ___ No ___

- c. Are residues treated prior to disposal?

Yes ___ No ___ Comments _____

If yes, are waste residues treated on-site or off-site?

On-site ___ Off-site ___

Identify waste code and treatment method:

Waste Code

Treatment Method

11. If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume?

Yes ___ No ___ Comments _____

E. Land Disposal

1. Are restricted and/or prohibited wastes placed in land disposal units such as landfills, surface impoundments, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers?

Yes ___ No ___

Note: Do not include surface impoundments addressed in D, Surface Impoundments.

If yes, specify which units and what wastes each unit has received:

2. Does the facility's operating record contain notices, certifications, and "soft hammer" demonstrations from generators/storers/treaters? These records must be maintained until facility closure.

Yes ___ No ___

3. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

Yes ___ No ___

If yes, at what frequency?

4. If prohibited wastes that exceed the treatment standards are placed in land disposal units (excluding wastes subject to national capacity variances) [268.30(a)], does the facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance from treatment standards [268.44]?

Yes ___ No ___

5. Does the facility dispose of restricted wastes that are subject to a national capacity variance or the "soft hammer" provisions?

Yes ___ No ___ Comments _____

If yes, have the minimum technology requirements been met for all units receiving such wastes?

Yes ___ No ___

6. Does the facility have notices [268.7(a)(3)] and records for disposed wastes that are subject to national capacity variances, case-by-case extensions [268.5], no migration petitions [268.6], or a variance from treatment standards?

Yes ___ No ___ NA ___

7. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

Yes ___ No ___ NA ___

8. Are restricted wastes placed in underground injection wells?

Yes ___ No ___ List _____

LIST OF RESTRICTED WASTES

CODES:

Asterisk (*) = U.S. EPA has established treatment standards or prohibition levels.
 No asterisk = Soft hammer wastes.
Underlined = Potential California List applicability.
Bold Print = Final third and newly listed wastes.
 NWW = Non-wastewater
 WW = Wastewater

Gen/Trans/Treat/Store/Disp	Gen/Trans/Treat/Store/Disp	Gen/Trans/Treat/Store/Disp
F001* <u>X</u> / / / / <u>X</u> /	F011* / / / / /	K037* / / / / /
F002* / / / / /	F012* / / / / /	K038* / / / / /
F003* / / / / /	<u>F019</u> / / / / /	K039* / / / / /
F004* / / / / /	F024* / / / / /	K040* / / / / /
F005* <u>X</u> / / / / <u>X</u> /	K001* / / / / /	<u>K041</u> / / / / /
F020* / / / / /	K004 / / / / /	<u>K042</u> / / / / /
F021* / / / / /	K005 (NWW)* / / / / /	K043* / / / / /
F022* / / / / /	K007 (NWW)* / / / / /	K044* / / / / /
F023* / / / / /	K008 / / / / /	K045* / / / / /
F026* / / / / /	K009* / / / / /	K046
F027* / / / / /	K010* / / / / /	(NWW - nonreactive)* / / / / /
F028* / / / / /	K011(NWW)* / / / / /	(NWW - reactive) / / / / /
Liquid Hazardous Wastes With:	(WW) / / / / /	(WW) / / / / /
As* / / / / /	K013(NWW)* / / / / /	K047* / / / / /
(500 mg/l)	(WW) / / / / /	K048* / / / / /
Cd* / / / / /	K014(NWW)* / / / / /	K049* / / / / /
(100 mg/l)	(WW) / / / / /	K050* / / / / /
Cr VI* / / / / /	K015(WW)* / / / / /	K051* / / / / /
(500 mg/l)	K016* / / / / /	K052* / / / / /
Pb* / / / / /	<u>K017</u> / / / / /	K060(NWW)* / / / / /
(500 mg/l)	K018* / / / / /	(WW) / / / / /
Hg* / / / / /	K019* / / / / /	K061
(20 mg/l)	K020* / / / / /	(NWW - low zinc)* / / / / /
Ni* / / / / /	K021(NWW)* / / / / /	(NWW - high zinc)* / / / / /
(134 mg/l)	(WW) / / / / /	(WW) / / / / /
Se* / / / / /	K022(NWW)* / / / / /	K062* / / / / /
(100 mg/l)	(WW) / / / / /	K069
Ti* / / / / /	K023* / / / / /	(NWW - nonCaSO ₄)* / / / / /
(130 mg/l)	K024* / / / / /	(NWW - CaSO ₄) / / / / /
pH* ≤ 2.0 / / / / /	K025(NWW)* / / / / /	(WW) / / / / /
PCBs* / / / / /	(WW) / / / / /	K071* / / / / /
≥ 50 ppm / / / / /	K027* / / / / /	<u>K073</u> / / / / /
Hazardous Wastes with:	K028* / / / / /	K083 (WW) / / / / /
HOCs* / / / / /	K029(NWW)* / / / / /	<u>K084</u> / / / / /
≥ 1,000 mg/l / / / / /	(WW) / / / / /	<u>K085</u> / / / / /
≥ 1,000 mg/kg / / / / /	K030* / / / / /	
F006 (NWW)* / / / / /	<u>K031</u> / / / / /	
(WW) / / / / /	<u>K035</u> / / / / /	
F007* / / / / /	K036* / / / / /	
F008* / / / / /		
F009* / / / / /		
F010* / / / / /		

	Gen/Trans/Treat/Store/Disp
0786	
(WW -	
Sol Wash)*	
(WW -	
Sol Wash)*	
(NWW -	
Sol Sludge)	
(WW -	
Sol Sludge)	
(NWW -	
Caustic/Water	
(WW -	
Caustic/Water)	
K087*	
K093*	
K094*	
K095 (NWW)*	
(WW)	
K096 (NWW)*	
(WW)	
K097	
K098	
K099*	
K100 (NWW)*	
K101	
(NWW -	
low As)*	
(NWW -	
high As)	
(WW)*	
K102	
(NWW -	
low As)*	
(NWW -	
high As)	
(WW)*	
K103*	
K104*	
K105	
K106	
K113*	
K114*	
K115*	
K116*	
P001	
P002	
P003	
P004	

	Gen/Trans/Treat/Store/Disp
P005	
P007	
P008	
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P011	
P012	
P013*	
P014	
P015	
P016	
P018	
P020	
P021*	
P026	
P027	
P029*	
P030*	
P036	
P037	
P039*	
P040*	
P041*	
P043*	
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P071*	
P072	
P074*	
P081	
P082	
P084	
P085*	

	Gen/Trans/Treat/Store/Disp
P087	
P089*	
P092	
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P099*	
P102	
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U026	

Gen/Trans/Treat/Store/Disp

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U069°
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U073
U074
U077
U078
U080
U083
U086
U087°
U088°
U089
U092
U093
U094
U095
U097
U098
U099
U101

Gen/Trans/Treat/Store/Disp

U102°
U103
U105
U106
U107°
U108
U109
U110
U111
U114
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U116
U119
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Gen/Trans/Treat/Store/Disp

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U239
U244
U248
U249

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: AMERICAN STEEL FOUNDRIES
 U.S. EPA I.D. No.: OH0981909418
 Street: 1001 E. BROADWAY
 City: ALLIANCE State: OHIO Zip Code: 44601

Telephone: (216) 823-6150

Operator: (SAME)

Street: _____

City: _____ State: _____ Zip Code: _____

Telephone: _____

Owner: AMSTED INDUSTRIES, INC.

Street: _____

City: CHICAGO State: IL Zip Code: _____

Telephone: _____

Inspection Date: 6/12/89 Time: _____ Weather Conditions: VARIABLE

	<u>Name</u>	<u>Affiliation</u>	<u>Telephone</u>
Inspectors:	<u>KEVIN BOND</u>	<u>DEPA</u>	<u>(216) 425-917</u>
	<u>KRIS CODER</u>	<u>DEPA</u>	<u>(216) 425-9171</u>
	<u>VICTORIA DEPPSCH</u>	<u>"</u>	<u>"</u>
Facility Representatives:	<u>CHUCK RUDD, AMSTED</u>		
	<u>PAUL LIMBACH, ASF</u>		

	<u>RCRA Status</u>	<u>F-Solvent</u>	<u>LDR Status</u> <u>California List</u>	<u>First Third</u>
Generator	_____	<u>X</u>	_____	_____
Transporter	_____	_____	_____	_____
Treater	_____	<u>X</u>	_____	_____
Storer	_____	_____	_____	_____
Disposer	_____	_____	_____	_____

INSPECTION SUMMARY

This inspection summary is based on analytical data from samples collected at ASF on June 9, 1987 during execution of an administrative search warrant. Our analysis of waste oils (five drum composite from an inventory of approximately 70 containers) has indicated the presence of chlorinated solvents and non-chlorinated solvents in excess of 3000 ppm. Based upon these data, use of two solvent parts washers, lack of manifests for spent solvents and our interviews of plant employees, ASF is in violation of OGC 3734.02(F) which prohibits treatment of hazardous wastes without an Ohio hazardous waste facility operating permit. Therefore, attached is a completed inspection form which summarizes ASF's compliance with standards applicable to generators and treatment, storage, disposal facilities.

RCRA treatment is broadly defined in OAC 3745-50-10 to include any process including physical mixing so as to render such waste non-hazardous.

In May 1987, U.S. EPA filed a complaint in U.S. District Court against ASF alleging unlawful treatment (comingling) of hazardous waste baghouse dusts with non-hazardous clarifier sludge. Whereas this practice appears to have ceased, ASF's mixing of hazardous waste solvents with non-hazardous waste oils is fundamentally identical.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

		Gen.	Treat	Store	Disp.	Trans.
A.	<u>F-Solvent Wastes</u>					
1.	F001	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2.	F002	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.	F003	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.	F004	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.	F005	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. California List Wastes

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

N/A

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Cadmium	100 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Chromium VI	500 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lead	500 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mercury	20 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Nickel	134 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Selenium	100 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Thallium	130 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L **N/A**

Gen.	Treat	Store	Disp.	Trans.
_____	_____	_____	_____	_____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0 **N/A**

_____	_____	_____	_____	_____
-------	-------	-------	-------	-------

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to **N/A**

50 ppm _____	_____	_____	_____	_____
--------------	-------	-------	-------	-------

500 ppm _____	_____	_____	_____	_____
---------------	-------	-------	-------	-------

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

_____ Yes _____ No _____ NA

If yes, state reasons for mixing:

5. Hazardous waste that contains HOCs greater than or equal to 1,000 mg/L (liquids) or 1,000 mg/kg (solids) **N/A**

_____	_____	_____	_____	_____
-------	-------	-------	-------	-------

Note (1): The prohibitions of 268.32(a)(3) and (e) do not apply if the waste is also subject to the solvent restrictions of 268 Subpart C for a specific HOC.

Note (2): The effective date of regulation for liquid wastes with HOCs greater than or equal to 1,000 mg/L and less than 10,000 mg/L was July 8, 1987; the effective date for liquid wastes containing HOCs greater than or equal to 10,000 mg/L and solid wastes containing HOCs greater than 1,000 mg/kg is November 8, 1988.

C. First Third Wastes N/A

- Note: (1) The detailed description for waste codes are listed in Appendix C.
 (2) EPA has promulgated the treatment standards for the following waste code with *.

	Gen.	Treat	Store	Disp.	Trans.
F006*	_____	_____	_____	_____	_____
F007	_____	_____	_____	_____	_____
F008	_____	_____	_____	_____	_____
F009	_____	_____	_____	_____	_____
F019	_____	_____	_____	_____	_____
K001*	_____	_____	_____	_____	_____
K004*	_____	_____	_____	_____	_____
K008*	_____	_____	_____	_____	_____
K011	_____	_____	_____	_____	_____
K013	_____	_____	_____	_____	_____
K014	_____	_____	_____	_____	_____
K015*	_____	_____	_____	_____	_____
K016*	_____	_____	_____	_____	_____
K017	_____	_____	_____	_____	_____
K018*	_____	_____	_____	_____	_____
K019*	_____	_____	_____	_____	_____
K020*	_____	_____	_____	_____	_____
K021*	_____	_____	_____	_____	_____
K022*	_____	_____	_____	_____	_____
K024*	_____	_____	_____	_____	_____
K025*	_____	_____	_____	_____	_____
K030*	_____	_____	_____	_____	_____
K031	_____	_____	_____	_____	_____
K035	_____	_____	_____	_____	_____
K036*	_____	_____	_____	_____	_____
K037*	_____	_____	_____	_____	_____
K044*	_____	_____	_____	_____	_____
K045*	_____	_____	_____	_____	_____
K046*	_____	_____	_____	_____	_____

	Gen.	Treat	Store	Disp.	Trans.
K047°	_____	_____	_____	_____	_____
K048°	_____	_____	_____	_____	_____
K049°	_____	_____	_____	_____	_____
K050°	_____	_____	_____	_____	_____
K051°	_____	_____	_____	_____	_____
K052°	_____	_____	_____	_____	_____
K060°	_____	_____	_____	_____	_____
K061°	_____	_____	_____	_____	_____
K062°	_____	_____	_____	_____	_____
K069°	_____	_____	_____	_____	_____
K071°	_____	_____	_____	_____	_____
K073°	_____	_____	_____	_____	_____
K083°	_____	_____	_____	_____	_____
K084	_____	_____	_____	_____	_____
K085	_____	_____	_____	_____	_____
K086°	_____	_____	_____	_____	_____
K087°	_____	_____	_____	_____	_____
K099°	_____	_____	_____	_____	_____
K100°	_____	_____	_____	_____	_____
K101°	_____	_____	_____	_____	_____
K102°	_____	_____	_____	_____	_____
K103°	_____	_____	_____	_____	_____
K104°	_____	_____	_____	_____	_____
K106°	_____	_____	_____	_____	_____
P001	_____	_____	_____	_____	_____
P004	_____	_____	_____	_____	_____
P005	_____	_____	_____	_____	_____
P010	_____	_____	_____	_____	_____
P011	_____	_____	_____	_____	_____
P012	_____	_____	_____	_____	_____
P015	_____	_____	_____	_____	_____
P016	_____	_____	_____	_____	_____
P018	_____	_____	_____	_____	_____

	Gen.	Treat	Store	Disp.	Trans.
P020	_____	_____	_____	_____	_____
P030	_____	_____	_____	_____	_____
P036	_____	_____	_____	_____	_____
P037	_____	_____	_____	_____	_____
P039	_____	_____	_____	_____	_____
P041	_____	_____	_____	_____	_____
P048	_____	_____	_____	_____	_____
P050	_____	_____	_____	_____	_____
P058	_____	_____	_____	_____	_____
P059	_____	_____	_____	_____	_____
P063	_____	_____	_____	_____	_____
P068	_____	_____	_____	_____	_____
P069	_____	_____	_____	_____	_____
P070	_____	_____	_____	_____	_____
P071	_____	_____	_____	_____	_____
P081	_____	_____	_____	_____	_____
P082	_____	_____	_____	_____	_____
P084	_____	_____	_____	_____	_____
P087	_____	_____	_____	_____	_____
P089	_____	_____	_____	_____	_____
P092	_____	_____	_____	_____	_____
P094	_____	_____	_____	_____	_____
P097	_____	_____	_____	_____	_____
P102	_____	_____	_____	_____	_____
P105	_____	_____	_____	_____	_____
P108	_____	_____	_____	_____	_____
P110	_____	_____	_____	_____	_____
P115	_____	_____	_____	_____	_____
P120	_____	_____	_____	_____	_____
P122	_____	_____	_____	_____	_____
P123	_____	_____	_____	_____	_____
U007	_____	_____	_____	_____	_____
U009	_____	_____	_____	_____	_____

	Gen.	Treat	Store	Disp.	Trans.
U010	_____	_____	_____	_____	_____
U012	_____	_____	_____	_____	_____
U016	_____	_____	_____	_____	_____
U018	_____	_____	_____	_____	_____
U019	_____	_____	_____	_____	_____
U022	_____	_____	_____	_____	_____
U029	_____	_____	_____	_____	_____
U031	_____	_____	_____	_____	_____
U036	_____	_____	_____	_____	_____
U037	_____	_____	_____	_____	_____
U041	_____	_____	_____	_____	_____
U043	_____	_____	_____	_____	_____
U044	_____	_____	_____	_____	_____
U046	_____	_____	_____	_____	_____
U050	_____	_____	_____	_____	_____
U051	_____	_____	_____	_____	_____
U053	_____	_____	_____	_____	_____
U061	_____	_____	_____	_____	_____
U063	_____	_____	_____	_____	_____
U064	_____	_____	_____	_____	_____
U066	_____	_____	_____	_____	_____
U067	_____	_____	_____	_____	_____
U074	_____	_____	_____	_____	_____
U077	_____	_____	_____	_____	_____
U078	_____	_____	_____	_____	_____
U086	_____	_____	_____	_____	_____
U089	_____	_____	_____	_____	_____
U103	_____	_____	_____	_____	_____
U105	_____	_____	_____	_____	_____
U108	_____	_____	_____	_____	_____
U115	_____	_____	_____	_____	_____
U122	_____	_____	_____	_____	_____
U124	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
U129	_____	_____	_____	_____	_____
U130	_____	_____	_____	_____	_____
U133	_____	_____	_____	_____	_____
U134	_____	_____	_____	_____	_____
U137	_____	_____	_____	_____	_____
U151	_____	_____	_____	_____	_____
U154	_____	_____	_____	_____	_____
U155	_____	_____	_____	_____	_____
U157	_____	_____	_____	_____	_____
U158	_____	_____	_____	_____	_____
U159	_____	_____	_____	_____	_____
U171	_____	_____	_____	_____	_____
U177	_____	_____	_____	_____	_____
U180	_____	_____	_____	_____	_____
U185	_____	_____	_____	_____	_____
U188	_____	_____	_____	_____	_____
U192	_____	_____	_____	_____	_____
U200	_____	_____	_____	_____	_____
U209	_____	_____	_____	_____	_____
U210	_____	_____	_____	_____	_____
U211	_____	_____	_____	_____	_____
U219	_____	_____	_____	_____	_____
U220	_____	_____	_____	_____	_____
U221	_____	_____	_____	_____	_____
U223	_____	_____	_____	_____	_____
U226	_____	_____	_____	_____	_____
U227	_____	_____	_____	_____	_____
U228	_____	_____	_____	_____	_____
U237	_____	_____	_____	_____	_____
U238	_____	_____	_____	_____	_____
U248	_____	_____	_____	_____	_____
U249	_____	_____	_____	_____	_____

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

___ Yes ~~___~~ No ___ NA

If yes, check the appropriate treatability group.

- ___ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
___ Pharmaceutical wastewater containing spent methylene chloride
~~___~~ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste? N/A

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

___ Yes ___ No ~~___~~ NA

If yes, specify the method: _____

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (e))?

___ Yes ___ No ~~___~~ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

3. First Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

___ Yes ___ No ☒ NA

If yes, check the appropriate treatability group.

___ Wastewater (less than 1% TOC by weight and less than 1% filterable solids)
 ___ Nonwastewaters

List the waste code and check the correct treatment standard group.

Waste Code	Wastewater	Nonwastewater
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

B. Waste Analysis

1. F-Solvent Wastes

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

___ Yes ☒ No ___ NA

How was this determination made? - NOT MADE

- Knowledge of waste

___ Yes ___ No

If yes, is any supporting data available for review? Describe how this is adequate. _____

- TCLP

___ Yes ___ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results. _____

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

☒ Yes ☐ No ☐ NA

If yes, specify the waste stream:

SPENT METHYLENE CHLORIDE
PERCHLOROETHYLENE

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

☒ Yes ☐ No ☐ NA MIXED WITH WASTE OIL

- d. How does the generator test F-solvent waste when a process or waste stream changes?

DOES NOT TEST
F-SOLVENT - DOES NOT
MANAGE AS HAZARDOUS WASTE

2. California List Wastes

N/A

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

☐ Yes ☐ No ☐ NA

- b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

☐ Yes ☐ No ☐ NA

What type of absorbent is used? _____

Check the types of waste to which absorbent is added.

☐ Liquid hazardous waste having a pH less than or equal to 2

☐ Liquid hazardous waste containing metals

☐ Liquid hazardous waste containing free cyanides

- c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

☐ Yes ☐ No ☐ NA

If yes, is any supporting data available for review? Describe how this is adequate. _____

- Testing _____ Yes _____ No _____ NA

If yes, list test method used: _____

d. Does the generator determine if concentration levels in the PFLT filtrate exceed cyanide and metals concentration levels?

_____ Yes _____ No _____ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____

e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

_____ Yes _____ No _____ NA

3. First Third Wastes: *N/A*

a. Does the generator correctly determine the appropriate treatment standard of the waste?

_____ Yes _____ No _____ NA

Note: The treatment standards for first third wastes are given in Appendix D.

b. Does the generator determine whether the First Third waste exceeds treatment standards upon generation?

_____ Yes _____ No _____ Soft hammer

If yes, specify the waste stream: _____

How was this determination made?

- Knowledge of waste

_____ Yes _____ No

If yes, is any supporting data available for review? Describe how this is adequate. _____

- TCLP

____ Yes ____ No ____ NA

- Total Constituent Analysis

____ Yes ____ No ____ NA

Provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- c. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

____ Yes ____ No ____ NA

- d. How does the generator test the waste when a process or waste stream changes?

C. Management

1. On-Site Management

Is restrict waste or waste that exceeds the treatment standards treated, stored, or disposed on-site?

☒ Yes ____ No

If yes, the TSD Checklist must be completed. ✓

2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

____ Yes ☒ No SHIPPED AS NON-HAZARDOUS TO WASTE OIL FACILITY

- b. Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

____ Yes ☒ No

- c. Does notification contain the following? DOES NOT PROVIDE
- | | | |
|-----------------------------------|---------|--------|
| EPA Hazardous waste number(s) | ___ Yes | ___ No |
| Applicable treatment standards | ___ Yes | ___ No |
| Manifest number | ___ Yes | ___ No |
| Waste analysis data, if available | ___ Yes | ___ No |

Identify off-site treatment or storage facilities: WASTE OIL
FACILITY - UNKNOWN

- d. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

___ Yes ☒ No

- e. Does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

___ Yes ___ No N/A

- f. Does notification contain the following?

N/A

EPA Hazardous waste number(s)	___ Yes	___ No
Applicable treatment standards	___ Yes	___ No
Manifest number	___ Yes	___ No
Waste analysis data, if available	___ Yes	___ No
Certification that the waste meets treatment standards	___ Yes	___ No

Identify off-site land disposal facilities: _____

- g. Is the waste subject to a nationwide variance, case by case extension (268.5), or petition (268.6)?

___ Yes ☒ No ___ NA

- h. If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

___ Yes ___ No N/A

- i. If yes, does the notification contain the following information? *N/A*

EPA Hazardous waste number ☐ Yes ☐ No

The corresponding treatment standards and all applicable prohibitions ☐ Yes ☐ No

Manifest number ☐ Yes ☐ No

Waste analysis data, if available ☐ Yes ☐ No

Date the waste is subject to the prohibitions ☐ Yes ☐ No

- j. Does the generator retain copies of all notices and certifications for a period of 5 years?

☐ Yes ☐ No

D. Demonstration and Certification -- "Soft Hammer" Wastes *N/A*

- a. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.3(a)(1)]?

☐ Yes ☐ No

- b. Has the generator submitted to the Regional Administration a demonstration and certification containing the following information to document its efforts to locate practically available treatment:

A list of facilities and facility officials contacted?

☐ Yes ☐ No

Addresses

☐ Yes ☐ No

Telephone Numbers

☐ Yes ☐ No

Contact dates

☐ Yes ☐ No

Attach a copy of the demonstration and certification

- c. If the generator has determined that there is no practically available treatment for its wastes, has it sent documentation to EPA demonstrating why it was not able to obtain treatment or recovery for the waste?

☐ Yes ☐ No

If yes, attach a copy of written discussion.

- d. Does the generator ship his waste off-site for treatment?

_____ Yes _____ No

Describe the type of treatment and treatment facilities _____

- e. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

_____ Yes _____ No

- f. Does the generator provide certification with each subsequent shipment of wastes?

_____ Yes _____ No

- g. Does the generator provide the following notification to the receiving facility with each shipment of waste?

(i) EPA Hazardous waste number _____ Yes _____ No

(ii) Manifest number _____ Yes _____ No

(iii) Waste analysis data, if available _____ Yes _____ No

- h. Does the generator retain copies of all notices, demonstrations, and certifications for a period of 5 years?

_____ Yes _____ No

E. Treatment Using RCRA 264/265 Exempt Units or Processes
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

N/A

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

_____ Yes _____ No

If yes, list types of waste treatment units and processes:

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

NO WASTE ANALYSIS PLAN

o F-solvent ☐ Yes ☒ No ☐ NA
 o California List ☐ Yes ☐ No ☐ NA
 o First Third ☐ Yes ☐ No ☐ NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

☐ Yes ☒ No

a. What date was the waste analysis plan last revised? NEVER DEVELOPED

b. Are analyses conducted on-site or off-site? NOT CONDUCTED

☐ On-site ☐ Off-site

Identify off-site lab: _____

- c. Is F-solvent waste analyzed using TCLP?

☐ Yes ☒ No ☐ NA

- d. Is First Third waste analyzed using the analytical method that is appropriate for the objective of the specified BDAT (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)?

☐ Yes ☐ No ☒ NA

Note: The appropriate analytical methods (TCLP or total constituent) for first third wastes with specified treatment standards are given in Appendix D.

- e. Describe the frequency of sampling: SAMPLING NOT CONDUCTED

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

____ Yes

NO OPERATING
RECORD
X No

B. Storage (268.50)

1. Are restricted wastes stored on-site?

____ Yes

____ No

> 90 DAYS
CANNOT
BE

SUBSTANTIATED

If no, go to C, Treatment.

2. If yes, check the appropriate method.

Tanks
Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

____ Yes

____ No

____ NA

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

____ Yes

____ No

5. Do operating records agree with container labeling?

____ Yes

____ No

____ NA

6. Do operating records contain copies of the notice, certification, and demonstration (if applicable) from the generator for the past 5 years?

____ Yes

____ No

7. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

_____ Yes _____ No _____ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

_____ Yes _____ No

If yes, state how: _____

8. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

_____ Yes _____ No _____ NA

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

_____ Yes _____ No

9. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

_____ Yes _____ No _____ NA

C. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

~~_____~~ Yes _____ No

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes: SPENT SOLVENTS
MIXED WITH NON-HAZARDOUS
WASTE OILS

3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue or residue extract (for treatment standards expressed as concentrations in the waste extract) from all treatment processes is less than treatment standards [268.7(b)]?

Yes ☒ No

4. Is dilution used as a substitute for treatment?

☒ Yes No

DILUTION IS SUBSTITUTE FOR PROPER DISPOSAL

6. Are notifications, demonstration, and certification (if applicable) prepared by the generators kept in the facility's operating record?

Yes No

N/A

NOT OFF-SITE TSD

7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?

Yes ☒ No NA

If yes, does the treatment facility provide notification and certification to the disposal facility?

N/A

Yes No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	<u>Yes</u>	<u>No</u>
Applicable treatment standards	<u>Yes</u>	<u>No</u>
Manifest number	<u>Yes</u>	<u>No</u>
Waste analysis data, if available	<u>Yes</u>	<u>No</u>
Certification that the waste meets the treatment standards	<u>Yes</u>	<u>No</u>

Identify off-site disposal facilities: _____

8. Does the facility ship any "soft hammer" waste to an off-site disposal facility?

____ Yes ____ No ~~____~~ NA

If yes, does the treatment facility send a copy of the generator's demonstration (if applicable) and certification to the disposal facility?

____ Yes ____ No

D. Treatment in Surface Impoundments

N/A

1. Are restricted wastes placed in surface impoundments for treatment?

____ Yes ____ No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

____ Yes ____ No

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

____ Yes ____ No ____ NA

4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

____ Yes ____ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41, or where no treatment standards are established for a waste, the applicable prohibition levels?

____ Yes ____ No

RCRA INTERIM STATUS INSPECTION FORM

Facility Name: AMERICAN STEEL FOUNDRIES Date of Inspection: 6/8, 9, 12/89
 Address: 1001 E. BROADWAY AVE EMTB #: _____
ALLIANCE, OHIO 44601 USEPA ID #: OH0981909418
 County: _____ Facility Phone #: (216) 823-6150

Facility Contact: PAUL LIMBACH Facility Contact Phone #: (216) 823-6150
CHUCK RUVO Safety Equipment #: HARD HAT
 Inspector(s) Name(s): KEVIN BONZO SAFETY GLASSES
NARS COOK STEEL TOE W/ META-
VICTORIA DEPPICH - 6/8, 9/89 TARSEL
PHOTN

STATUS
 Cond. Ex. SQG _____ SQG _____ Generator ☒ Transporter _____ Treatment ☒ Storage _____ Disposal _____

ACTIVITIES
 Containers ☒ Tanks _____ Surface Impoundments _____ Incineration/Thermal treatment _____
 Waste pile ☒ Land treatment _____ Landfill _____ Groundwater monitoring _____
 Used oil burner _____ Hazardous waste fuel burner/blender _____

	<u>Y/N/NA</u>	<u>REMARK #</u>
1. Does the facility produce "discarded materials" as defined in 3745-51-02(A)?	<u>X</u>	_____
2. Are they :		
a. Abandoned (disposed; incinerated; accumulated, stored, or treated prior to disposal)?	<u>X</u>	_____
b. Recycled?	_____	_____
c. Inherently waste-like? (F020, F021, F022, F023, F026, F028)?	_____	_____
3. If recycled or accumulated, treated or stored before recycling, is the waste:		
a. Used in a manner constituting disposal?	_____	_____
b. Burned for energy recovery?	_____	_____
c. Reclaimed? (Refer to Table 1 of 3745-51-02)	_____	_____
d. Accumulated speculatively?	_____	_____
4. Is the material recycled by being:		
a. Used or reused as an ingredient in an industrial process to make a product without prior reclamation?	_____	_____
b. Used as an effective substitute for commercial products?	_____	_____
c. Returned to the original process from which it was generated without prior reclamation as a substitute for a raw material feedstock?	_____	_____

REMARKS

1. Are Land Disposal Restricted (LDR) wastes generated? If so, complete appropriate LDR checklist.
2. Has the facility submitted a Part A application to Ohio EPA in accordance with OAC 3745-50-40?
3. If yes, is it complete and accurate and does it contain all information specified in OAC 3745-50-41, -42, -43?
4. If not accurate, has a Permit Change Request (PCR) been submitted in accordance with 3745-50-51? If yes, what date was the PCR submitted.
5. Is the facility operating in compliance with the terms and conditions of its HWFB permit?
6. Has the facility submitted a Part B?
7. Was advance notice of the inspection given? If so, how far in advance?

X F-SOLVENT
WASTES

N

N/A

N/A

N/A

N/A

N

3745-52 GENERATOR REQUIREMENTS (40 CFR Part 262)

Y/N/NA REMARK #

1. Have the wastes generated at this facility been evaluated as required under 3745-52-11 (262.11)?
2. Does this facility generate any hazardous wastes that are excluded from regulation under 3745-51-04 (261.4)?
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment [3745-65-01] (265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit [3745-65-01] (265.1(c)(10))?
4. Is the generator classified as a Small Quantity Generator (SQG) or conditionally exempt SQG?
If so, complete appropriate checklist.
5. Does the generator meet the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:
 - a. All hazardous wastes shipped off-site have been accompanied by a completed manifest using the most recently revised USEPA form 8700-22?
 - b. The manifest form used contains all the information required by 3745-52-20 (262.20) and the minimum number of copies required by 3745-52-22 (262.22)?
 - c. The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with 3745-52-20(C)(D)(E) (262.20)?
 - d. Prepared manifests have been signed by the generator and initial transporter in compliance with 3745-52-23(A)(1&2) (262.23)?
 - e. The generator has complied with manifest exception reporting requirements in 3745-52-42 (262.42(a))?
 - f. Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by 3745-52-40 (262.40)?

<u>N</u>	<u>SEE COVER LETTER</u>
<u>N</u>	<u> </u>
<u>N</u>	<u> </u>
<u>N</u>	<u> </u>
<u>N</u>	<u>SEE COVER LETTER</u>
<u>X</u>	<u>*</u>
<u>X</u>	<u> </u>
<u>X</u>	<u> </u>
<u>X</u>	<u> </u>
<u>X</u>	<u> </u>
<u>X</u>	<u> </u>

- 4 -

* COMPLIANCE EVALUATED FOR D006/D008 WASTES ONLY — OFF-SITE DISPOSAL OF BAGHOUSE DUSTS,

- | | <u>Y/N/NA</u> | <u>REMARK #</u> |
|--|---------------|-----------------|
| 6. Does the generator meet the following hazardous waste pre-transport requirements: | _____ | _____ |
| a. Prior to offering hazardous wastes for transport off-site, the waste material is packaged, labeled, and marked in accordance with applicable DOT regulations [3745-52-30, 3745-52-31, and 3745-52-32] (262.30, 262.31, 262.32)? | <u>N</u> | _____ |
| b. Prior to offering hazardous waste for transport off-site, each container with a capacity of 110 gallons or less is affixed with a completed hazardous waste label as required by 3745-52-32 (262.32)? | <u>N</u> | _____ |
| c. Prior to offering hazardous wastes for transport off-site, the generator meets requirements for properly placarding or offering to properly placard for the initial transporter of the waste material in compliance with 3745-52-33 (262.33)? | <u>N</u> | _____ |
| 7. Does the generator import or export hazardous waste? | <u>N</u> | _____ |
| If so, are the wastes handled in accordance with the requirements of 3745-52-50 (262.50)? | <u>N/A</u> | _____ |
| 8. If the generator elects to accumulate hazardous waste on-site in <u>containers</u> or <u>tanks</u> for <u>90 days or less</u> without a hazardous waste facility installation and operation permit as provided under 3745-52-34 (262.34), are the following requirements with respect to such accumulation met: | | |
| a. The containers or tanks are clearly marked with the words "Hazardous Waste"? | <u>N</u> | _____ |
| b. The date that accumulation began is clearly marked on each container? | <u>N</u> | _____ |
| c. If the waste is accumulated in containers, the generator is complying with OAC 3745-66-70 to 3745-66-77? Complete <u>Management of Containers</u> checklist. | <u>See</u> | _____ |

ATTACHED
CHECKLIST

- d. If the waste is accumulated in tanks, the generator is complying with OAC 3745-66-90, to 3745-66-992 except OAC 3745-66-97(C) and 3745-66-991? Complete Storage and Treatment in Tanks checklist. N/A
- e. If the generator accumulates waste at or near the point of generation which is under the control of the operator of the process generating the waste as allowed by 3745-52-34(C) are the following requirements met:
1. Quantities of waste accumulated do not exceed 55 gallons at any time? N/A
 2. Quantities of acutely hazardous waste accumulated do not exceed 1 quart at any one time? N/A
 3. If the generator is accumulating hazardous waste in accordance with e.1 or e.2, above, has the generator marked the containers with words "Hazardous Waste" or with other words identify the contents of the container and is the generator complying with OAC 3745-66-71, 3745-66-72, 3745-66-73(A), 3745-66-76, and 3745-66-77? N/A
 4. If the generator accumulates hazardous wastes in excess of the amounts listed in either e.1 or e.2, above, did the generator comply with 3745-52-34(A) (262.34(a)) within three (3) days and mark the container holding the excess accumulation with the date the excess accumulation began accumulating? N/A
9. Has the generator accumulated hazardous wastes in excess of ninety (90) days? N/A *
10. Has the generator been granted an extension by the Director/ Regional Administrator for accumulation in excess of ninety (90) days? N/A
11. Has the generator treated, stored, disposed of, transported or offered for transportation hazardous waste without having obtained a USEPA identification number from the Administrator as required under 3745-52-12 (262.12)? N/A

- 6 -

* CANNOT BE SUBSTANTIATED
DUE TO LACK OF MANIFESTS,
LABELS WITH ACCUMULATION DATES

12. Does the generator provide a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) (265.16) including instruction in safe equipment operation and emergency procedures, training new employees within 6 months and providing an annual training program refresher course? [3745-52-34(A)(4)] (262.34) N
13. Does the generator keep all of the records required by 3745-65-16(D)(E) (265.16) including written job titles, job descriptions and documented employee training records? [3745-52-34(A)(4)] (262.34) N
14. Has the generator filed annual reports on or before March 1st of the next calendar year as required by 3745-52-41? Y SEE COVER LETTER
15. Does the generator comply with the applicable requirements for owners or operators of hazardous waste facilities? Complete "Preparedness and Prevention" and "Contingency Plan and Emergency Procedures" checklists. SEE ATTACHED CHECKLISTS

REMARKS, GENERATOR REQUIREMENTS

Y/N/NA REMARK :

1. Is the facility operated to minimize the possibility of fire, explosion, or non-planned release of hazardous waste?
[3745-65-31] (265.31) N
2. Has there been a fire, explosion or non-planned release of waste at the facility?
a. If yes, has the contingency plan been implemented? N/A
3. If required due to actual hazards associated with the waste, does the facility have the following equipment:
[3745-65-32(A)(B)(C)(D)] (265.32)
 - a. Internal alarm system? Y
 - b. Access to telephone, radio or other device for summoning emergency assistance? Y
 - c. Portable fire control equipment? N
 - d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers? Y
4. Is all required spill control and decontamination equipment, fire and communications equipment tested and maintained as necessary?
[3745-65-33] (265.33) N
5. If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34] (265.34) N
6. If required due to the actual hazards associated with the waste, is adequate aisle space to allow unobstructed movement of emergency or spill control equipment maintained? [3745-65-35] (265.35) N
7. If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with the possible hazards and the facility layout? [3745-65-37(A)] (265.37(a)) N

MINNA REMARK :

1. Does the o/o have a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes which contains the following components for the facility? [3745-65-52(A)(B)(C)(D)(E)] (265.52):

- a. Actions to be taken by personnel in the event of an emergency incident?
- b. Arrangements or agreements with local or state emergency authorities?
- c. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator?
- d. A list of all emergency equipment including location, physical description and outline of capabilities?
- e. If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52(F)] (265.52(F))?

N
N
N
Y
N

NEED HOME ADDRESSES

2. Is a copy of the Contingency Plan and any plan revisions maintained on-site and has it been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan? [3745-65-53(A)(B)] (265.53)

Y

REVIEWED
CERTIFIED
MAIL
RECEIPTS

3. Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54] (265.54)

N

4. Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the Contingency Plan designated at all times (on-site or on-call)? [3745-65-56(A-J)] (265.56)

Y

5. If an emergency situation has occurred, has the emergency coordinator implemented all or part of the Contingency Plan and taken all of the actions and made all of the notifications deemed necessary under 3745-65-56(A-J). (265.56(a-j))

N/A

		Y/N/NA	REMARK #
1.	Are hazardous wastes stored in containers which are:		
a.	Closed [3745-66-73(A)] (265.173)?	<u>N</u>	—
b.	In good condition [3745-66-71] (265.171)?	<u>Y</u>	—
c.	Compatible with the wastes stored in them [3745-66-72] (265.172)?	<u>Y</u>	—
2.	Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)] (265.173(a))	<u>N</u>	—
3.	Are hazardous waste containers stored, handled and opened in a manner which prevents container rupture or leakage? [3745-66-73(B)] (265.173(b))	<u>N</u>	—
4.	Is the area where containers stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74] (265.174) [documentation of inspections required under 3745-65-15 for TSDs]	<u>N</u>	—
5.	Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] (265.176)	<u>Y</u>	—
6.	Are containers holding hazardous wastes stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] (265.177(c))	<u>Y</u>	—

Y/N/NA REMARK

Does the owner/operator (o/o) have a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by 3745-65-13(A)(1) (265.13(a))?

N _____

Does o/o have a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. [3745-65-13(B)] (265.13(b))

N _____

a. Would physical contact with the waste structures or equipment injure unknowing/unauthorized person or livestock entering the facility? [3745-65-14(A)(1)] (265.14(a)(1))
b. Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14(A)(2)] (265.14(a)(2))

Y _____

Y _____

IF BOTH 3A AND 3B ARE NO, MARK QUESTIONS 4 AND 5 NOT APPLICABLE.

Does the facility have -

a. A 24-hour surveillance system, or
b. An artificial or natural barrier and a means to control entry at all times [3745-65-14(B)(2)(a and b)] (265.14(b)(2))

Y _____

Y _____

Does the facility have a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. [3745-65-14(C)] (265.14(c))

Y _____

a. Has the o/o developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. [3745-65-15] (265.15)

N _____

b. Are areas subject to spills (i.e., loading and unloading areas, etc.) inspected daily when in use and according to other applicable regulations when not in use. [3745-65-15(3)(4)] (265.15(b)(4))

N _____

7. Has the o/o provided a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course? (265.16(a)(b)(c))

N DOCUMENTED
IN GENERATOR
PART OF
N COVER
LETTER

8. Does o/o keep all records required by 3745-65-16(D)(E) including written job titles, job descriptions and documented employee training records? (265.16(d)(e))

9. If Ignitable, Reactive or incompatible wastes are handled, does the facility meet the following requirements?
[3745-65-17] (265.17)

- a. Protection from sources of ignition.
- b. Physical separation of incompatible waste materials.
- c. "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.
- d. Comingling of waste materials is done in a controlled, safe manner as prescribed by 3745-65-17(B) (265.17(b))

Y _____
Y _____
N _____

* CANNOT BE
EVALUATED -

MINOTA REVIEW

Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented. [3743-65-37(3)] (265.37(b))

1/10

3745-65 MANIFEST SYSTEM/RECORDS REPORTING 40 CFR PART 265, SUBPART E

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

Y/N/NA REMARK #

2. Does the o/o maintain a written operating record at the facility as required by 3745-65-73(A) (265.73) which contains the following information:

- a. Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date and method pertinent to such treatment, storage or disposal? [3745-65-73(B)(1)] (265.73(b)(1)).
- b. Common name, EPA Hazardous Waste Identification Number and physical state (solid, liquid, gas) of the waste?
- c. The estimated (or actual) weight, volume or density of the waste material?
- d. A description of the method(s) used to treat, store or dispose of the waste using the EPA handling codes listed in Table 2 of OAC 3745? (Part 265, Appendix I, Table 2)
- e. The present physical location of each hazardous waste within the facility?
- f. Records of incidents which require implementation of the Contingency Plan?
- g. FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document numbers? [3745-65-73(B)(2)] (265.73(b)(2)).
- h. Records of any waste analyses and trial tests required to be performed?
- i. Records of the inspections required under 3745-65-15 (265.15) (General Inspection Requirements)?
- j. Records of any monitoring, testing, or analytical data required under other Subparts as referenced by 3745-65-73(B)(6);(265.73(b)(6))?

✓	
✓	

k. Records of closure cost estimates and post-closure (DISPOSAL ONLY) cost estimates required under OAC 3745-66 (Part 265 Subpart G)?

N SEE
SUBPART G
CHECKLIST

2. Has the o/o submitted an annual (biennial) Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under 3745-65-75 (265.75)?

N _____

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE ONLY TO OFF-SITE TSDS.

3. Are manifests received by the facility signed and dated? Is one copy given to the transporter, one copy sent to the generator within 30 days and one copy kept for at least 3 years? [3745-65-71(A)] (265.71)

N/A _____

a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met [3745-65-71(B)] (265.71(b))?

b. Are any significant discrepancies in the manifest, as defined in 3745-65-72(A) (265.72(a)) noted in writing on the manifest document.

4. Have any manifest discrepancies been reconciled within 15 days as required by 3745-65-72(B) (265.72(b)) or has the o/o submitted the required information to the Director/Regional Administrator?

5. If the facility has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by 3745-65-76(A) (265.76) been submitted to the Director/Regional Administrator within 15 days?

Is a written closure plan on file at the facility which contains the following elements: [3745-66-12] (265.112)?

- A description of how each hazardous waste management unit will be closed in accordance with 265.111.
- A description of how final closure will meet the requirements of 3745-66-11 (265.111).
- An estimate of the maximum amount of hazardous waste ever in inventory.
- A description of steps taken to remove or decontaminate facility equipment containment systems, structures, soils, and all hazardous waste residues.
- The year closure is expected to begin and a schedule for the various phases of closure.
- A description of other activities necessary to ensure closure with the performance standards including ground water monitoring, leachate collection, and run-off control.

Has the closure plan (and post-closure plan, if applicable) been amended 60 days prior to any changes in facility design, processes, or closure dates or 60 days after an unexpected event occurs which affects the closure plan? [3745-66-12(C)] (265.112(C))

Has the closure plan (and post-closure plan, if applicable) for surface impoundment, waste pile, land treatment or landfill units been submitted to the Director/Regional Administrator 180 days prior to beginning the closure process? [3745-66-12(D)] (265.112(d))

Has the closure plan (and post-closure plan, if applicable) for tank, containers storage or incinerator units been submitted to the Director/Regional Administrator 45 days prior to beginning the closure process? [3745-66-12(D)] (265.112(d))

Y/N/NA REMARKS

N

N

N/A CLOSURE
 HAS NOT
 BEEN
 INITIATED
 N/A AT THIS
 TIME.

3. Within 90 days of receipt of the final volume of waste or Director's plan approval, if that is later, was all hazardous waste treated, removed, or disposed in accordance with the approved plan? [3745-66-13(A)] (265.113(a))
6. Was closure completed in accordance with the approved plan within 180 days after receipt of final volume of waste or approval of the plan, if that is later? [3745-66-13(B)] (265.113(b))
7. Did the owner/operator submit to the Director/Regional Administrator, within sixty (60) days after completion of closure, certification by both the owner/operator and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan? [3745-66-15] (265.115)
8. Did the owner/operator submit to the local zoning authority and the Director/Regional Administrator a survey plan in accordance with OAC 3745-66-16?
9. What permitted units at the facility have been closed in accordance with an approved Closure Plan?
10. If closure was partial, list the regulated units which remain in use at the facility:
11. If required, has the facility prepared a written post-closure plan? [3745-66-18] (265.118)
12. Does the post-closure plan include:
 - a. A description of proposed ground water monitoring?
 - b. A description of planned maintenance activities?
 - c. The name, address and phone number of person/office to contact during the post-closure period?

N/A

N/A

N/A

N/A

none

N/A

N/A

✓

13. For disposal facilities, has the owner/operator submitted to local land authorities and the Director a survey plat within 60 days after certification of closure? [3745-66-19] (265.119)

N/A

14. Has the owner of the property on which a disposal unit is located recorded on the deed that:

- a. The land has been used to manage hazardous waste and the type, quantity and location of waste?
- b. Land use is restricted pursuant to 3745-66-17? [3745-66-19] (265.119)

Y

✓
May 25, 1988 9:00 AM
Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

GENERAL INFORMATION

Facility: AMERICAN STEEL FOUNDRIES Address: LAKE PARK BLVD. AT HALLCK City: SEBRING TWP.
State: OHIO Zip Code: _____ County: MAHONING Telephone: _____

IIWFAO # _____

U.S. EPA I.D. # OHIO 017497587

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	<u>PAUL LUMBACH</u>	<u>WORKS ENGINEER</u>	<u>(216) 823-6150</u>
2.	<u>CHARLES RUVO</u>	<u>MGR. QUALITY AND ENVIRONMENTAL AFFAIRS</u>	<u>(312) 938-4016</u>
3.	_____	_____	_____

INSPECTOR(S)

1.	<u>KEVIN BOALZO</u>	<u>ENVIRONMENTAL SCIENTIST</u>	<u>(216) 425-9171</u>
2.	_____	_____	_____
3.	_____	_____	_____

INSTALLATION ACTIVITY

Mark One

If the site is a TSDF, check the boxes indicating which areas were reviewed.

☐ Generator only (G)

☐ Transporter (T)

☒ TSDF only

☐ G-T

☐ G-TSDF

☐ T-TSDF

☐ G-T-TSDF

☒ General Facility Standards, Preparedness
and Prevention, Contingency and Emergency
Manifests/Records/Reporting, Closure

☐ Containers S01

☐ Tanks S02/T01

☐ Surface Impoundments S04/T02

☐ Incineration/Thermal Treatment

☐ Waste Piles S03

☐ Land Treatment D01

☒ Landfills D00

☐ Chemical/Physical/
Biological T04

☒ Groundwater Monitoring

☐ Post-Closure

RCRA INTERIM STATUS INSPECTION FORM

1. Has the facility submitted a Part A to Ohio?
2. If "yes", is it complete and accurate?
3. Has the facility submitted a Part B?
4. Was advance notice of the inspection given? If so, how far in advance?

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	#1
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	~ 7 WKS.

IF THE SITE HAS RECEIVED A PART B PERMIT, USE THE RCRA STATUS INSPECTION FORM.

REMARKS, GENERAL INFORMATION

Include a brief description of site activity and waste handling.

#1 - PART A SUBMITTED IN NOV. 1980 FOR LANDFILL DISPOSAL OF DBOC WASTE.

IN JUNE 1982, ASF REQUESTS USEPA WITHDRAW PART A APPLICATION BASED ON THEIR TESTING OF WASTE STREAM,

USEPA ACKNOWLEDGES REQUEST IN

APRIL 1983 BASED ON

INFORMATION SUBMITTED AT THAT

TIME. SUBSEQUENT SAMPLING BY U.S. EPA

CONFIRMS DISPOSAL OF HAZARDOUS WASTES

AT THIS FACILITY. INFORMATION - 2

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RCRA INTERIM STATUS INSPECTION FORM

40 CFR 265 (OAC 3745-65-et seq.) GENERAL INTERIM STATUS REQUIREMENTS AND TSD REQUIREMENTS

Yes No N/A Remark #

Subpart B: General Facility Standards

1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a) [3745-65-13(A)(1)]

✓ — — —

2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. (Section 265.13(b)) [3745-65-13(B)]

— ✓ — #1

3. a) Would physical contact with the waste structures or equipment injure unknowing/unauthorized persons or livestock entering the facility? (265.14(a)(1)) [3745-65-14(A)(1)]

✓ — — —

b) Would disturbance of the waste cause a violation of the hazardous waste regulations? (265.14(a)(2)) [3745-65-14(A)(2)]

✓ — — —

IF BOTH 3a AND 3b ARE "NO", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".

4. The facility has —

a) A 24-hour surveillance system, or

— ✓ — —

b) An artificial or natural barrier and a means to control entry at all times (265.14(b)(2)). [3745-65-14(B)(2)(a and b)]

— ✓ — #2

5. The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265-14(c)) [3745-65-14(C)]

— ✓ — —

#1 - NO WASTE ANALYSIS PLAN DEVELOPED

#2 - ACCESSIBLE FROM WEST, SOUTH, SOUTHEAST VIA HEACOCK RD.

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
6. a) The operator has developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. (265.15) [3745-65-15]	—	✓	—	#3
b) Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4)) [3745-65-15(D)(4)]	—	✓	—	—
7. The facility has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. [3745-65-16(A)(D)(C)]	—	✓	—	#4
8. The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records. [3745-65-16(D)(E)]	—	✓	—	#4
9. If required due to the actual hazards associated with Ignitable, Reactive or Incompatible waste materials, the facility meets the following requirements: (Section 265.17) [3745-65-17]				
a) Protection from sources of ignition.	—	—	✓	—
b) Physical separation of incompatible waste materials.	—	—	✓	—
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	—	—	✓	—
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b). [3745-65-17(D)]	—	—	✓	—

#3 - NO INSPECTION PLAN DEVELOPED

#4 - NO PERSONNEL TRAINING SPECIFIC TO
HAZARDOUS WASTE MANAGEMENT

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31) [3745-65-31] — ☒ — —
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32) [3745-65-32(A)(B)(C)(D)]
 - a) Internal alarm system. — — ☒ — #5
 - b) Access to telephone, radio or other device for summoning emergency assistance. ☒ — — —
 - c) Portable fire control equipment. — — ☒ —
 - d) Water of adequate volume and pressure via hoses sprinkler, foamers or sprayers. — — ☒ —
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) [3745-65-33] — ☒ — #6
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) [3745-65-34] ☒ — — #5
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35) [3745-65-35] — — ☒ —
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)) [3745-65-37(A)] — — ☒ —
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)) [3745-65-37(B)] — — ☒ —

#5 - TRUCKS EQUIPPED WITH RADIOS (CHANGE FROM LAST INSPECTION)

#6 - TESTING AND MAINTENANCE NOT DOCUMENTED

PREPAREDNESS AND PREVENTION - 1

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RCRA INTERIM STATUS INSPECTION FORM

Page No. 1 of 1

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes (265.51) [3745-65-52(A)(B)(C)(D)(E)] and contains the following components:

a) Actions to be taken by personnel in the event of an emergency incident.

b) Arrangements or agreements with local or state emergency authorities.

c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.

d) A list of all emergency equipment including location, physical description and outline of capabilities.

e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) [3745-65-52(F)]

2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) [3745-65-53(A)(B)]

3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54) [3745-65-54]

4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56) [3745-65-55]

5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56(a-j). [3745-65-56(A-j)]

#7 - NO CONTINGENCY PLAN DEVELOPED,
NO ASSIGNED EMERGENCY COORDINATOR (FOR THIS FACILITY)

CONTINGENCY AND EMERGENCY - 1

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RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

1. The operator maintains a written operating record at his facility as required by Section 265.73 [3745-65-73(A)] which contains the following information:

- a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment, storage or disposal. (265.73(b)(1)) [3745-65-73(B)(1)]
- b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).
- c) The estimated (or actual) weight, volume or density of the waste material(s).
- d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).
- e) The present physical location of each hazardous waste within the facility.
- f) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2)) [3745-65-73(B)(2)]
- g) Records of any waste analyses and trial tests required to be performed.
- h) Records of the inspections required under Section 265.15 [3745.65.14] (General Inspection Requirements - Subpart B).
- i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6). [3745-65-73(B)(6)]
- j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart G.

Yes	No	N/A	Remark #
—	✓	—	# 8
—	✓	—	
—	✓	—	
—	✓	—	
—	✓	—	
—	✓	—	
—	✓	—	
—	✓	—	
—	✓	—	
—	✓	—	

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
2. The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75. [3745-65-75]	—	✓	—	#9
NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO <u>ONLY</u> OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.				
3. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71) [3745-65-71(A)]	—	✓	—	—
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b)) [3745-65-71(B)]	—	✓	—	—
b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) [3745-65-72(A)] are noted in writing on the manifest document. (265.71(a)(2)) [3745-65-71(A)(2)]	—	✓	—	—
4. Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) <u>or</u> the operator has submitted the required information to the Regional Administrator/Director. [3745-65-72(B)]	—	✓	—	—
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days. [3745-65-76(A)]	—	✓	—	—

#8 - FACILITY DOES NOT MAINTAIN A WRITTEN OPERATING RECORD.

#9 - ANNUAL REPORTS ARE NOT SUBMITTED

#10 - MANIFESTS HAVE NOT BEEN USED FOR SHIPMENTS TO THIS FACILITY

RCRA INTERIM STATUS INSPECTION FORM

SUBPART F: GROUND WATER MONITORING

ADEQUACY TO BE
EVALUATED BY
CME CURRENTLY
UNDER PREPARATION

Type of facility: (check appropriately)

- a) surface impoundment
- b) landfill
- c) land treatment facility

Yes No Unknown Waived

NOTE: UNDER INTERIM STATUS STANDARDS A WASTE PILE IS NOT SUBJECT TO GROUND WATER MONITORING REQUIREMENTS. PLEASE NOTE, HOWEVER, THAT IF ANY HAZARDOUS WASTE FROM A WASTE PILE IS LEFT IN PLACE AT CLOSURE, THE "WASTE PILE" BECOMES A "LANDFILL" AND MUST MEET POST-CLOSURE RULES APPLICABLE TO LANDFILLS.

Ground Water Monitoring Program

1. Was the ground water monitoring program reviewed prior to site visit?
If "No",

a) Was the ground water program reviewed at the facility prior to site inspection?

2. Has a ground water monitoring program (capable of determining the facility's impact on the quality of ground water in the uppermost aquifer underlying the facility) been implemented?
265.90(a) [3745-65-90(A)]

3. Has at least one monitoring well been installed in the uppermost aquifer hydraulically upgradient from the limit of the waste management area? 265.91(a)(1) [3745-65-91(A)(1)]

a) Are ground water samples from the uppermost aquifer, representative of background ground water quality and not affected by the facility (as ensured by proper well number, location and depths)?

	<u>Yes</u>	<u>No</u>	<u>Unknown</u>	<u>Waived</u>
4. Have at least three monitoring wells been installed hydraulically downgradient at the limit of the waste handling or management area? 265.91(a)(2) [3745-65-91(A)(2)]	—	—		
a) Do well number, locations and depths ensure prompt detection of any statistically significant amounts of hazardous waste or hazardous waste constituents that migrate from the waste management area to the uppermost aquifer?	—	—		
5. Have the locations of the waste management areas been verified to conform with information in the ground water program?	—	—	—	
a) If the facility contains multiple waste management components, is each component adequately monitored?	—	—		
6. Do the numbers, locations, and depths of the ground water monitoring wells agree with the data in the ground water monitoring system program? If "No", explain discrepancies.	—	—	—	
7. Well completion details. 265.91(c) [3745-65-91(C)]				
a) Are wells properly cased?	—	—	—	
b) Are wells screened (perforated) and packed where necessary to enable sampling at appropriate depths?	—	—	—	
c) Are annular spaces properly sealed to prevent contamination of ground water?	—	—	—	

	<u>Yes</u>	<u>No</u>	<u>Unknown</u>	<u>Waived</u>
8. Has a ground water sampling and analysis plan been developed? 265.92(a) [3745-65-92(A)]	—	—	—	
a) Has it been followed?	—	—	—	
b) Is the plan kept at the facility?	—	—	—	
c) Does the plan include procedures and techniques for:				
1) Sample collection?	—	—		
2) Sample preservation?	—	—		
3) Sample shipment?	—	—		
4) Analytical procedures?	—	—		
5) Chain of custody control?	—	—		
9. Are the required parameters in ground water samples being tested quarterly for the first year? 265.92(b) [3745-65-92(B)] and 265.92(c)(1) [3745-65-92(C)]	—	—		
a) Are the ground water samples analyzed for the following:				
1) Parameters characterizing the suitability of the ground water as a drinking water supply? 265.92(b)(1) [3745-65-92(B)(1)]	—	—		
2) Parameters establishing ground water quality? 265.92(b)(2) [3745-65-92(B)(2)]	—	—		
3) Parameters used as indicators of ground water contamination? 265.92(b)(2) [3745-65-92(B)(3)]	—	—		
(1) For each indicator parameter are at least four replicate measurements obtained at each upgradient well for each sample obtained during the first year of monitoring? 265.92(c)(2) [3745-65-92(C)(2)]	—	—		

	<u>Yes</u>	<u>No</u>	<u>Unknown</u>	<u>Not Applicable</u>
(11) Are provisions made to calculate the initial background arithmetic mean and variance of the respective parameter concentrations or values obtained from the upgradient well(s) during the first year? 265.92(c)(2) [3745-65-92(C)(2)]	—	—		
b) For facilities which have completed first year ground water sampling and analysis requirements:				
1) Have samples been obtained and analyzed for the ground water quality parameters at least annually? 265.92(d)(1) [3745-65-92(D)(1)]	—	—		
2) Have samples been obtained and analyzed for the indicators of ground water contamination at least semi-annually? (4 replicate measurements per sample) 265.92(d)(2) [3745-65-92(D)(2)]	—	—		
c) Were ground water surface elevations determined at each monitoring well each time a sample was taken? 265.92(e) [3745-65-92(E)]	—	—		
d) Were ground water surface elevations evaluated annually to determine whether the monitoring wells are properly placed? 265.92(f) [3745-65-92(E)]	—	—		
e) If it was determined that modification of the number, location or depth of monitoring wells was necessary, was the system brought into compliance with 265.91(a) [3745-65-91(A)]? 265.93(f) [3745-65-93(F)]	—	—		
10. Has an outline of a ground water quality assessment program been prepared? 265.93(a) [3745-65-93(A)]	—	—		
a) Does it describe a program capable of determining:				
1) Whether hazardous waste or hazardous waste constituents have entered the ground water?	—	—		
2) The rate and extent of migration of hazardous waste or hazardous waste constituents in ground water?	—	—		
3) Concentrations of hazardous waste or hazardous waste constituents in ground water?	—	—		

	<u>Yes</u>	<u>No</u>	<u>Unknown</u>	<u>Waived</u>
b) After the first year of monitoring, have at least four replicate measurements of each indicator parameter been obtained for samples taken for each well? 265.93(b) [3745-65-93(B)]	—	—		
1) Were the results compared with the initial background means from the upgradient well(s) determined during the first year?	—	—		
(i) Was each well considered individually?	—	—		
(ii) Was the Student's t-test used (at the 0.01 level of significance?)	—	—		
2) Was a significant increase (or pH decrease as well) found in the:				
(i) Upgradient wells (If "Yes", Compliance Checklist A-2 must also be completed.) [3745-65-93(C)(1)]	—	—		
(ii) Downgradient wells	—	—		
If "Yes", owner or operator must obtain, split, and analyze additional samples from the wells where a significant difference was detected. If the difference is confirmed, the Director should be notified in writing within 7 days and a ground water assessment plan within 15 days. [3735-65-93(C)(2) and (D)(2)(3)]				
11. Have records been kept of analyses for parameters in 265.92(c) and (d) [3745-65-92(C) and (D)]? 265.94(a)(1) [3745-65-94(A)(1)]	—	—		
12. Have records been kept of ground water surface elevations taken at the time of sampling for each well? 265.94(a)(1) [3745-65-94(A)(1)]	—	—		
13. Have records been kept of required elevations in 265.93(b) [3745-65-93(B)]? 265.94(a)(1) [3745-65-94(A)(1)]	—	—		
14. Have the following been submitted to the Director of the Ohio EPA: 265.94(a)(2) [3745-65-94(A)(2)]				
a) Initial background concentrations of parameters listed in 265.92(b) [3745-65-92(B)] within 15 days after completing each quarterly analysis required during the first year?	—	—		

Yes No Unknown Waived

b) For each well, have any parameters whose concentrations or values have exceeded the maximum contaminant levels allowed in drinking water supplied been separately identified?

c) Annual reports including: [3745-65-94(A)(2)]

1) Concentrations or values of parameters used as indicators of ground water contamination for each well along with required evaluations under 265.93(b) [3745-65-93(B)]?

2) Any significant differences from initial background values in upgradient wells separately identified?

3) Results of the evaluation of ground water surface elevations?

Comments: Subpart F

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES.

1. A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112) [3745-66-12]
 - a) A description of how and when the facility will be closed. (265.112(a)(1)) [3745-66-12(A)(1)]
 - b) A description of how any of the applicable closure requirements in other Subparts of Section 265 [3745-66] (Tanks, Surface Impoundments, Landfill, etc.) will be carried out.
 - c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. (NOTE: Maximum inventory should agree with the permit.)
 - d) A description of steps taken to decontaminate facility equipment.
 - e) The year closure is expected to begin and a schedule for the various phases of closure.
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates. (265.112(4)(B)) [3745-66-12(B)]
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process. (265.112(4)(C)) [3745-66-12(C)]

—	✓	—	# 11
—	✓	—	
—	✓	—	
—	✓	—	
—	✓	—	
—	✓	—	
—	✓	—	
—	✓	—	

(OR POST-CLOSURE)

#11 - NO CLOSURE PLANS AVAILABLE.

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart H: Financial Requirements

1. The owner or operator of the facility has established financial assurance for closure by use of one of the following: (265.143) [3745-66-43]

a) A closure trust fund, or

b) A surety bond, or

c) A closure letter of credit, or

d) A combination of financial mechanisms.

2. A written cost estimate for closure of the facility (as specified in the closure plan) is available. How much is it?

3. When was the most recent estimate made?

4. A written cost estimate for post closure care of the facility (if applicable) is available. How much is it?

5. When was the most recent estimate made?

—	✓	—	# 12
—	✓	—	
—	✓	—	
—	✓	—	
—	✓	—	
—	✓	—	
—	✓	—	
—	✓	—	
—	✓	—	
—	✓	—	✓

REMARKS, GENERAL INTERIM STATUS REQUIREMENTS

12 - NO FINANCIAL ASSURANCE ESTABLISHED

(NO LIABILITY COVERAGE ESTABLISHED)

(40 CFR 265.147, EAC 3745-66-47)

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart N: Landfills

1. General Operating Requirements. Does the facility provide the following:

NOTE: 1a, 1b AND 1c ARE EFFECTIVE ON NOVEMBER 19, 1981.

a) Diversion of run-on away from active portions of the fill?
(265.302(a)) [3745-68-02(A)]

— ✓ — #13

b) Collection of run-off from active portions of the fill?
(265.302(b)) [3745-68-02(B)]

— ✓ —

c) Is collected run-off treated? [3745-68-02(B)]

— ✓ —

d) Control of wind dispersal of hazardous waste? (265.302(d)) [3745-68-02(D)]

— ✓ —

2. Surveying and Recordkeeping. Does the operating record include: [3745-68-09]

a) a map showing the exact location and dimensions of each cell?
(269.309(a)) [3745-68-09(A)]

— ✓ —

b) The contents of each cell and the location of each hazardous waste
type within each cell? (269.309(b)) [3745-68-09(B)]

— ✓ —

3. Closure and Post-Closure

a) Is the closure Plan available for inspection?

— ✓ — #11

b) Has this plan been submitted to the Regional Administrator?

— ✓ —

c) Has Closure begun?

— ✓ —

d) Is Closure cost estimate available by?

— ✓ —

#13 - OPERATING REQUIREMENTS INCLUDE SPECIFIC DESIGN,
CONSTRUCTION, OPERATION AND MAINTENANCE CRITERIA
FOR RUN-OFF AND RUN-ON CONTROL AND FOR
LANDFILLS - 1 WIND DISPERSAL
CONTROL

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	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
4. Special requirements for ignitable or reactive waste. (265.312(a)(8))				
a) Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive?	—	—	✓	—
NOTE: IF WASTE IS RENDERED NON-REACTIVE OR NON-IGNITABLE, SEE TREATMENT REQUIREMENTS. IF NOT, THE PROVISIONS OF 40 CFR 265.17(b) APPLY. [3745-65-17]				
5. Special requirements for Incompatible Wastes.				
a) Does the owner or operator dispose of incompatible wastes in separate cells? If not, the provisions of 40 CFR 265.17(b) apply. [3745-65-17]	—	—	✓	—
6. Special requirements for Containers:				
Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill? (265.315) [3745-57-85]	—	—	✓	—
7. Special requirements for Liquid Waste.				
Bulk or non-containerized liquid waste or waste containing free liquids is placed in a landfill having a liner and leachate collection and removal system meeting 264.301(a) requirements or is treated so that free liquids are no longer present. (265.314(a)) [3745-68-14(A)]	—	✓	—	—
8. A written Post-Closure Plan is on file at the facility.	—	✓	—	#11
9. The Post-Closure Plan has been amended within 60 days in response to any changes in facility design or operation. (265.118(b))	—	✓	—	↓
10. The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure. (265.118(c))	—	✓	—	↓
11. The property owner has attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under Section 265.117(c) [3745-66-17(C)] as required in Section 265.120 [3745-66-10].	—	✓	—	—

✓ MAY 25, 1988, 9:00 AM
Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

IIHFAB # _____

U.S. EPA I.D. # OHIO 981 909416

GENERAL INFORMATION

Facility: AMERICAN STEEL FURNACES Address: 1001 E. BROADWAY City: ALLIANCE
State: OHIO Zip Code: 44601 County: STARK Telephone: (216) 823-6150

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	<u>PAUL LIMBACH</u>	<u>WORKS ENGINEER</u>	<u>(216) 823-6150</u>
2.	<u>CHARLES RUUD</u>	<u>MGR. QUALITY AND ENVIRONMENTAL AFFAIRS</u>	<u>(312) 938-4018</u>
3.	_____	_____	_____

INSPECTOR(S)

1.	<u>KEVIN BOZZO</u>	<u>ENVIRONMENTAL SCIENTIST, OHIO EPA</u>	<u>(216) 425-9171</u>
2.	_____	_____	_____
3.	_____	_____	_____

INSTALLATION ACTIVITY

Mark One

If the site is a TSDF, check the boxes indicating which areas were reviewed.

- | | | |
|--|---|---|
| <input checked="" type="checkbox"/> Generator only (G) | <input checked="" type="checkbox"/> General Facility Standards, Preparedness and Prevention, Contingency and Emergency Manifests/Records/Reporting, Closure | <input type="checkbox"/> Waste Piles S03 |
| <input type="checkbox"/> Transporter (T) | | <input type="checkbox"/> Land Treatment D01 |
| <input type="checkbox"/> TSDF only | <input checked="" type="checkbox"/> Containers S01 - <u>TRAILERS FOR ZAF DUST</u> | <input type="checkbox"/> Landfills D00 |
| <input type="checkbox"/> G-T | <input type="checkbox"/> Tanks S02/T01 | <input type="checkbox"/> Chemical/Physical/Biological 104 |
| <input type="checkbox"/> G-TSDF | <input type="checkbox"/> Surface Impoundments S04/T02 | <input type="checkbox"/> Groundwater Monitoring |
| <input type="checkbox"/> T-TSDF | <input type="checkbox"/> Incineration/Thermal Treatment | <input type="checkbox"/> Post-Closure |
| <input type="checkbox"/> G-T-TSDF | | |

RCRA INTERIM STATUS INSPECTION FORM

1. Has the facility submitted a Part A to Ohio?

2. If "yes", is it complete and accurate?

3. Has the facility submitted a Part B?

4. Was advance notice of the inspection given? If so, how far in advance?

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
—	✓	—	—
—	—	✓	—
✓	—	—	—
—	—	—	~ 4 WEEKS

IF THE SITE HAS RECEIVED A PART B PERMIT, USE THE RCRA STATUS INSPECTION FORM.

REMARKS, GENERAL INFORMATION

Include a brief description of site activity and waste handling.

RCRA INTERIM STATUS INSPECTION FORM

40 CFR 262 (OAC 3745-52) GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11. [3745-52-11(D)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2AF DUST TESTED,
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 [3745-51-04] (statutory exclusions) or Section 261.6 [3745-51-06(A)(1)] (recycle/reuse)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	MANIFESTED AS HAZARDOUS WASTE
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) [3745-65-01] or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10) [3745-65-01]	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) [3745-52-21] and the minimum number of copies required by Section 262.22 [3745-52-22].	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	# 1
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20 [3745-52-20(B)(C)(D)].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N.J. Zinc Co
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23 [3745-52-23(A)(1 and 2)].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a)(b) [3745-52-42].	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40 [3745-52-40]. (262.40(a)) [3745-52-40(a)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a)) [3745-52-30, 3745-52-31, 3745-52-32]	✓	—	—	—
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b) [3745-52-32].	—	—	✓	—
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33 [3745-52-33].	✓	—	—	TRANSPORTER PLACARDS. ASF NEEDS PLACARDS ON HAND
6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50 [3745-52-50]	—	—	✓	—
7. If the generator elects to store hazardous waste on-site in <u>containers</u> or <u>tanks</u> for <u>90 days</u> or less without a RCRA storage permit as provided under Section 262.34 [3745-52-34], the following requirements with respect to such storage are met:				
a) The containers are clearly marked with the words "Hazardous Waste".	✓	—	—	—
b) The date that accumulation began is clearly marked on each container.	✓	—	—	—
8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) [3745-65-16(A)(B)(C)] including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. (Section 262.34) [3745-52-34(A)(4)]	—	—	—	#2
9. The generator keeps all of the records required by Section 265.16(d)(e) [3745-65-16(D)(E)] including written job titles, job descriptions and documented employee training records (Section 262.34) [3745-52-34(A)(4)].	—	—	—	#2

RCRA INTERIM STATUS INSPECTION FORM

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265 [3745-65], SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, GENERATOR REQUIREMENTS

- #1 - WHEREAS THE MANIFESTS DO CONTAIN ALL THE REQUIRED INFORMATION, ASF IS USING THE SEBRING DISPOSAL FACILITY ID # ON AT LEAST TWO MANIFESTS (DOCUMENT #9 + #10)
- #2 - THE PERSONNEL TRAINING REQUIREMENTS OF 40 CFR 265.16 HAVING
DAC 3745-65-16 ARE SPECIFIC RULES FOR
TRAINING PERSONNEL TO PROPERLY MANAGE
HAZARDOUS WASTES. ASF MUST DEVELOP
A TRAINING PROGRAM AND MAINTAIN REQUIRED
RECORDS AND VOB DESCRIPTIONS.

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31) [3745-65-31]
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32) [3745-65-32(A)(D)(C)(D)]
 - a) Internal alarm system.
 - b) Access to telephone, radio or other device for summoning emergency assistance.
 - c) Portable fire control equipment.
 - d) Water of adequate volume and pressure via hoses sprinkler, foamers or sprayers.
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) [3745-65-33]
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) [3745-65-34]
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35) [3745-65-35]
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)) [3745-65-37(A)]
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)) [3745-65-37(B)]

—	✓	—	—
✓	—	—	FIRE ALARM PULL BOXES - AUTOCALL SYSTEM
✓	—	—	Intercom main scale
—	—	✓	—
—	—	✓	—
✓	—	—	REC'D COPY OF 5-4-88 INSPECTION LOG
✓	—	—	INTERCOM AT SCALE ADJACENT TO BARGEHOUSE
—	—	✓	—
—	✓	—	SEE COVER LETTER FOR DISCUSSION
—	—	✓	—

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes (265.51) [3745-65-52(A)(B)(C)(D)(E)] and contains the following components: Rec'd COPY @ TIME OF INSPECTION.
 - a) Actions to be taken by personnel in the event of an emergency incident. ✓ — — C.P. NOT SUBMITTED TO EMERGENCY RESPONSE AGENCIES
 - b) Arrangements or agreements with local or state emergency authorities. — ✓ —
 - c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator. ✓ — —
 - d) A list of all emergency equipment including location, physical description and outline of capabilities. ✓ — —
 - e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) [3745-65-52(F)] — — ✓
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) [3745-65-53(A)(B)] — ✓ — C.P. MAINTAINED ON-SITE, NOT SUBMITTED TO ANY EMERGENCY RESPONSE AGENCIES.
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54) [3745-65-54] — — ✓
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56) [3745-65-55] ✓ — —
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56(a-j). [3745-65-56(A-J)] — — ✓

RCRA INTERIM STATUS INSPECTION FORM

Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173) [3745-66-73(A)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) In good physical condition (265.171) [3745-66-71]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Compatible with the wastes stored in them (265.172) [3745-66-72]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a)) [3745-66-73(A)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	ROLL-BACK TARP
3. Hazardous waste containers are stored, handled and opened in a manner which prevents container rupture or leakage. (265.173(b)) [3745-66-73(B)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174) [3745-66-74]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	REC'D COPY OF INSPECTION FORM
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176) [3745-66-76]	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
6. Containers holding hazardous wastes are stored separate from other materials which may interact with the waste in a hazardous manner. (265.177(c)) [3745-66-77(C)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

August 27, 1987 3:00 PM
Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

HWFAB # _____

U.S. EPA I.D. # OH D 017 497587

GENERAL INFORMATION

Facility: AMERICAN STEEL FOUNDRIES Address: LAKE PARK BLVD. AT HEACOCK City: SEBRING TWP.
State: OHIO Zip Code: _____ County: MAHONING Telephone: NO TELEPHONE

INSPECTION PARTICIPANT(S)

(Name)	(Title)	(Telephone)
1. <u>DAVID E. STATLER</u>	<u>WORKS ENGINEER</u>	<u>216/823-6150</u>
2. <u>CHARLES A. RUOD</u>	<u>MGR. QUALITY AND ENVIRONMENTAL AFFAIRS</u>	<u>312/938-4018</u>
3. _____	_____	_____

INSPECTOR(S)

1. <u>KEVIN M. BONZO</u>	<u>ENVIRONMENTAL SCIENTIST</u>	<u>216/425-9171</u>
2. <u>JENNIFER TURNERMAN</u>	<u>ENVIRONMENTAL SCIENTIST</u>	<u>216/425-9171</u>
3. _____	_____	_____

INSTALLATION ACTIVITY

Mark One

☐ Generator only (G)

☐ Transporter (T)

☒ TSDF only

☐ G-T

☐ G-TSDF

☐ T-TSDF

☐ G-T-TSDF

If the site is a TSDF, check the boxes indicating which areas were reviewed.

☒ General Facility Standards, Preparedness and Prevention, Contingency and Emergency Manifests/Records/Reporting, Closure

☐ Containers S01

☐ Tanks S02/T01

☐ Surface Impoundments S04/T02

☐ Incineration/Thermal Treatment

☐ Waste Piles S03

☐ Land Treatment D01

☒ Landfills D00

☐ Chemical/Physical/Biological T04

☒ Groundwater Monitoring

☐ Post-Closure

RCRA INTERIM STATUS INSPECTION FORM

1. Has the facility submitted a Part A to Ohio?
2. If "yes", is it complete and accurate?
3. Has the facility submitted a Part B?
4. Was advance notice of the inspection given? If so, how far in advance?

Yes	No	N/A	Remark #
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	#1
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	~ 2 wks

IF THE SITE HAS RECEIVED A PART B PERMIT, USE THE RCRA STATUS INSPECTION FORM.

REMARKS, GENERAL INFORMATION

Include a brief description of site activity and waste handling.

REMARK #1 - PART A SUBMITTED TO US EPA AND DEPA. WITHDRAWN BY USEPA EFFECTIVE 19 APRIL 1983. ON 19 NOV. 1984, DEPA INSPECTED THIS FACILITY TO VERIFY REQUEST FOR WITHDRAWAL OF PART A. PART A WITHDRAW LETTER SUBMITTED BY ASF TO DEPA ON 16 JULY 1981.

SITE DESCRIPTION - THIS DISPOSAL SITE IS OWNED BY ASF AND WAS FORMERLY A COAL STRIP MINE LATER MINED FOR CLAY. ASF HAS OPERATED THIS 12.5 ACRE SITE FOR DISPOSAL OF FOUNDRY SAND, SLAG, SLUDGE AND EAF DUST. INFORMATION - 2 EMISSION CONTROL DUST. Revised 12/84

RCRA INTERIM STATUS INSPECTION FORM

40 CFR 265 (OAC 3745-65-et seq.) GENERAL INTERIM STATUS REQUIREMENTS AND TSD REQUIREMENTS

Yes No N/A Remark #

Subpart B: General Facility Standards

1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a) [3745-65-13(A)(1)]

✓ — — —

2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. (Section 265.13(b)) [3745-65-13(B)]

— ✓ — — # 1

3. a) Would physical contact with the waste structures or equipment injure unknowing/unauthorized persons or livestock entering the facility? (265.14(a)(1)) [3745-65-14(A)(1)]

✓ — — —

b) Would disturbance of the waste cause a violation of the hazardous waste regulations? (265.14(a)(2)) [3745-65-14(A)(2)]

✓ — — —

IF BOTH 3a AND 3b ARE "NO", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".

4. The facility has -

a) A 24-hour surveillance system, or

— ✓ — —

b) An artificial or natural barrier and a means to control entry at all times (265.14(b)(2)). [3745-65-14(B)(2)(a and b)]

— ✓ — — # 2

5. The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265-14(c)) [3745-65-14(C)]

— ✓ — —

REMARKS - # 1 NO WASTE ANALYSIS PLAN DEVELOPED

2 ACCESSIBLE FROM WEST, SOUTH, SOUTHEAST VIA

GENERAL FACILITY STANDARDS - 1 HEACOCK RD.

Revised 12/84

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
6. a) The operator has developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. (265.15) [3745-65-15]	—	✓	—	# 3
b) Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4)) [3745-65-15(B)(4)]	—	✓	—	—
7. The facility has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. [3745-65-16(A)(B)(C)]	—	✓	—	# 4
8. The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records. [3745-65-16(D)(E)]	—	✓	—	# 4
9. If required due to the actual hazards associated with Ignitable, Reactive or Incompatible waste materials, the facility meets the following requirements: (Section 265.17) [3745-65-17]				
a) Protection from sources of ignition.	—	—	✓	—
b) Physical separation of incompatible waste materials.	—	—	✓	—
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	—	—	✓	—
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b). [3745-65-17(B)]	—	—	✓	—

REMARKS- #3 NO INSPECTION PLAN DEVELOPED
 #4 NO PERSONNEL TRAINING SPECIFIC TO HAZARDOUS
 WASTE MANAGEMENT

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart C: Preparedness and Prevention

- | | | | | |
|--|---|---|---|-----|
| 1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31) [3745-65-31] | — | ✓ | — | — |
| 2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32) [3745-65-32(A)(B)(C)(D)] | | | | |
| a) Internal alarm system. | — | — | ✓ | — |
| b) Access to telephone, radio or other device for summoning emergency assistance. | — | ✓ | — | # 1 |
| c) Portable fire control equipment. | — | — | ✓ | — |
| d) Water of adequate volume and pressure via hoses sprinkler, foamers or sprayers. | — | — | ✓ | — |
| 3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) [3745-65-33] | — | ✓ | — | # 1 |
| 4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) [3745-65-34] | ✓ | — | — | # 2 |
| 5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35) [3745-65-35] | — | — | ✓ | — |
| 6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)) [3745-65-37(A)] | — | — | ✓ | # 3 |
| 7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)) [3745-65-37(B)] | — | — | ✓ | — |

REMARKS - # 1 REQUIRES COMMUNICATION DEVICE BE IMMEDIATELY AVAILABLE AT THE SCENE OF OPERATIONS. NO PHONE WAS AVAILABLE
 PREPAREDNESS AND PREVENTION - 1 DURING OUR INSPECTION.

Revised 12/84

2 TRUCKS EQUIPPED WITH RADIOS

2 MATERIAL IS NOW INSTALLED TO PROTECT

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes (265.51) [3745-65-52(A)(B)(C)(D)(E)] and contains the following components:
 - a) Actions to be taken by personnel in the event of an emergency incident. — ☒ — # 1
 - b) Arrangements or agreements with local or state emergency authorities. — ☒ — # 1
 - c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator. — ☒ — # 1
 - d) A list of all emergency equipment including location, physical description and outline of capabilities. — ☒ — # 1
 - e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) [3745-65-52(F)] — ☒ — # 1
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) [3745-65-53(A)(B)] — ☒ — # 1
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54) [3745-65-54] — ☒ — # 1
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56) [3745-65-55] — ☒ — # 2
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56(a-j). [3745-65-56(A-J)] — ☒ — # 1 # 2

REMARKS - # 1 NO CONTINGENCY PLAN HAS BEEN DEVELOPED
 # 2 NO DESIGNATED EMERGENCY COORDINATOR

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

1. The operator maintains a written operating record at his facility as required by Section 265.73 [3745-65-73(A)] which contains the following information:

- a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment, storage or disposal. (265.73(b)(1)) [3745-65-73(B)(1)]
- b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).
- c) The estimated (or actual) weight, volume or density of the waste material(s).
- d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).
- e) The present physical location of each hazardous waste within the facility.
- f) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2)) [3745-65-73(B)(2)]
- g) Records of any waste analyses and trial tests required to be performed.
- h) Records of the inspections required under Section 265.15 [3745.65.14] (General Inspection Requirements - Subpart B).
- i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6). [3745-65-73(B)(6)]
- j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart G.

—	✓	—	# /
—	✓	—	—
—	✓	—	—
—	✓	—	—
—	✓	—	—
—	✓	—	—
—	✓	—	—
—	✓	—	—
—	✓	—	—

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
2. The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75. [3745-65-75]		<input checked="" type="checkbox"/>		# 2

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

3. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71) [3745-65-71(A)]		<input checked="" type="checkbox"/>		# 3
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b)) [3745-65-71(B)]		<input checked="" type="checkbox"/>		# 3
b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) [3745-65-72(A)] are noted in writing on the manifest document. (265.71(a)(2)) [3745-65-71(A)(2)]		<input checked="" type="checkbox"/>		# 3
4. Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) <u>or</u> the operator has submitted the required information to the Regional Administrator/Director. [3745-65-72(B)]		<input checked="" type="checkbox"/>		# 3
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days. [3745-65-76(A)]		<input checked="" type="checkbox"/>		# 3

REMARKS - #1 FACILITY DOES NOT HAVE A WRITTEN OPERATING RECORD.
 #2 ANNUAL REPORTS HAVE NOT BEEN SUBMITTED.
 #3 MANIFESTS ARE NOT USED

RCRA INTERIM STATUS INSPECTION FORM

SUBPART F: GROUND WATER MONITORING

Type of facility: (check appropriately)

- a) surface impoundment
- b) landfill
- c) land treatment facility

Yes No Unknown Waived

☒ ☒ ☐ ☐

NOTE: UNDER INTERIM STATUS STANDARDS A WASTE PILE IS NOT SUBJECT TO GROUND WATER MONITORING REQUIREMENTS. PLEASE NOTE, HOWEVER, THAT IF ANY HAZARDOUS WASTE FROM A WASTE PILE IS LEFT IN PLACE AT CLOSURE, THE "WASTE PILE" BECOMES A "LANDFILL" AND MUST MEET POST-CLOSURE RULES APPLICABLE TO LANDFILLS.

Ground Water Monitoring Program

1. Was the ground water monitoring program reviewed prior to site visit?
If "No",

☐ ☒ #1

a) Was the ground water program reviewed at the facility prior to site inspection?

☐ ☒ #1

2. Has a ground water monitoring program (capable of determining the facility's impact on the quality of ground water in the uppermost aquifer underlying the facility) been implemented?
265.90(a) [3745-65-90(A)]

☐ ☒ #1

3. Has at least one monitoring well been installed in the uppermost aquifer hydraulically upgradient from the limit of the waste management area? 265.91(a)(1) [3745-65-91(A)(1)]

☐ ☐ N/A #2

a) Are ground water samples from the uppermost aquifer, representative of background ground water quality and not affected by the facility (as ensured by proper well number, location and depths)?

☐ ☐ N/A #2

	<u>Yes</u>	<u>No</u>	<u>Unknown</u>	<u>Waived</u>
4. Have at least three monitoring wells been installed hydraulically downgradient at the limit of the waste handling or management area? 265.91(a)(2) [3745-65-91(A)(2)]	—	—	N/A	#2-
a) Do well number, locations and depths ensure prompt detection of any statistically significant amounts of hazardous waste or hazardous waste constituents that migrate from the waste management area to the uppermost aquifer?	—	—		
5. Have the locations of the waste management areas been verified to conform with information in the ground water program?	—	—	—	
a) If the facility contains multiple waste management components, is each component adequately monitored?	—	—		
6. Do the numbers, locations, and depths of the ground water monitoring wells agree with the data in the ground water monitoring system program? If "No", explain discrepancies.	—	—	—	
7. Well completion details. 265.91(c) [3745-65-91(C)]				
a) Are wells properly cased?	—	—	—	
b) Are wells screened (perforated) and packed where necessary to enable sampling at appropriate depths?	—	—	—	
c) Are annular spaces properly sealed to prevent contamination of ground water?	—	—	—	

	Yes	No	Unknown	Waived
8. Has a ground water sampling and analysis plan been developed? 265.92(a) [3745-65-92(A)]	—	—	N/A	# 2
a) Has it been followed?	—	—	—	—
b) Is the plan kept at the facility?	—	—	—	—
c) Does the plan include procedures and techniques for:				
1) Sample collection?	—	—	—	—
2) Sample preservation?	—	—	—	—
3) Sample shipment?	—	—	—	—
4) Analytical procedures?	—	—	—	—
5) Chain of custody control?	—	—	—	—
9. Are the required parameters in ground water samples being tested quarterly for the first year? 265.92(b) [3745-65-92(B)] and 265.92(c)(1) [3745-65-92(C)]	—	—	—	—
a) Are the ground water samples analyzed for the following:				
1) Parameters characterizing the suitability of the ground water as a drinking water supply? 265.92(b)(1) [3745-65-92(B)(1)]	—	—	—	—
2) Parameters establishing ground water quality? 265.92(b)(2) [3745-65-92(B)(2)]	—	—	—	—
3) Parameters used as indicators of ground water contamination? 265.92(b)(2) [3745-65-92(B)(3)]	—	—	—	—
(1) For each indicator parameter are at least four replicate measurements obtained at each upgradient well for each sample obtained during the first year of monitoring? 265.92(c)(2) [3745-65-92(C)(2)]	—	—	—	—

	Yes	No	Unknown	Waived
(11) Are provisions made to calculate the initial background arithmetic mean and variance of the respective parameter concentrations or values obtained from the upgradient well(s) during the first year? 265.92(c)(2) [3745-65-92(C)(2)]	—	—	~ / A	# 2
b) For facilities which have completed first year ground water sampling and analysis requirements:				
1) Have samples been obtained and analyzed for the ground water quality parameters at least annually? 265.92(d)(1) [3745-65-92(D)(1)]	—	—		
2) Have samples been obtained and analyzed for the indicators of ground water contamination at least semi-annually? (4 replicate measurements per sample) 265.92(d)(2) [3745-65-92(D)(2)]	—	—		
c) Were ground water surface elevations determined at each monitoring well each time a sample was taken? 265.92(e) [3745-65-92(E)]	—	—		
d) Were ground water surface elevations evaluated annually to determine whether the monitoring wells are properly placed? 265.92(f) [3745-65-92(E)]	—	—		
e) If it was determined that modification of the number, location or depth of monitoring wells was necessary, was the system brought into compliance with 265.91(a) [3745-65-91(A)]? 265.93(f) [3745-65-93(F)]	—	—		
10. Has an outline of a ground water quality assessment program been prepared? 265.93(a) [3745-65-93(A)]	—	—		
a) Does it describe a program capable of determining:				
1) Whether hazardous waste or hazardous waste constituents have entered the ground water?	—	—		
2) The rate and extent of migration of hazardous waste or hazardous waste constituents in ground water?	—	—		
3) Concentrations of hazardous waste or hazardous waste constituents in ground water?	—	—		

	<u>Yes</u>	<u>No</u>	<u>Unknown</u>	<u>Waived</u>
b) After the first year of monitoring, have at least four replicate measurements of each indicator parameter been obtained for samples taken for each well? 265.93(b) [3745-65-93(B)]	—	—	N/A	# 2
1) Were the results compared with the initial background means from the upgradient well(s) determined during the first year?	—	—		
(i) Was each well considered individually?	—	—		
(ii) Was the Student's t-test used (at the 0.01 level of significance?)	—	—		
2) Was a significant increase (or pH decrease as well) found in the:				
(i) Upgradient wells (If "Yes", Compliance Checklist A-2 must also be completed.) [3745-65-93(C)(1)]	—	—		
(ii) Downgradient wells	—	—		
If "Yes", owner or operator must obtain, split, and analyze additional samples from the wells where a significant difference was detected. If the difference is confirmed, the Director should be notified in writing within 7 days and a ground water assessment plan within 15 days. [3735-65-93(C)(2) and (D)(2)(3)]				
11. Have records been kept of analyses for parameters in 265.92(c) and (d) [3745-65-92(C) and (D)? 265.94(a)(1) [3745-65-94(A)(1)]	—	—		
12. Have records been kept of ground water surface elevations taken at the time of sampling for each well? 265.94(a)(1) [3745-65-94(A)(1)]	—	—		
13. Have records been kept of required elevations in 265.93(b) [3745-65-93(B)]? 265.94(a)(1) [3745-65-94(A)(1)]	—	—		
14. Have the following been submitted to the Director of the Ohio EPA: 265.94(a)(2) [3745-65-94(A)(2)]				
a) Initial background concentrations of parameters listed in 265.92(b) [3745-65-92(B)] within 15 days after completing each quarterly analysis required during the first year?	—	—	✓	✓

	<u>Yes</u>	<u>No</u>	<u>Unknown</u>	<u>Waived</u>
b) For each well, have any parameters whose concentrations or values have exceeded the maximum contaminant levels allowed in drinking water supplied been separately identified?	—	—	N/A	#2
c) Annual reports including: [3745-65-94(A)(2)]				
1) Concentrations or values of parameters used as indicators of ground water contamination for each well along with required evaluations under 265.93(b) [3745-65-93(B)]?	—	—		
2) Any significant differences from initial background values in upgradient wells separately identified?	—	—		
3) Results of the evaluation of ground water surface elevations?	—	—		

Comments: Subpart F

REMARKS - #1 APPLICATION OF SUBPART F REQUIRES DEVELOPMENT OF A GROUND WATER MONITORING PROGRAM WHICH INCLUDES A SAMPLING AND ANALYSIS PLAN, PROGRAM EVALUATION AND REPORTING REQUIREMENTS THROUGHOUT THE ACTIVE LIFE OF THE FACILITY

#2 BECAUSE THE ENVIRONMENTAL ASSESSMENT DOES NOT FULFILL THE REGULATORY REQUIREMENTS OF SUBPART F, THESE ITEMS WERE 'NOT APPLICABLE' TO THIS EVALUATION.

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES.

- | | | | | |
|---|---|---|---|---|
| 1. A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112) [3745-66-12] | — | ✓ | — | 1 |
| a) A description of how and when the facility will be closed.
(265.112(a)(1)) [3745-66-12(A)(1)] | — | ✓ | — | — |
| b) A description of how any of the <u>applicable</u> closure requirements in other Subparts of Section 265 [3745-66] (Tanks, Surface Impoundments, Landfill, etc.) will be carried out. | — | ✓ | — | — |
| c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. (NOTE: Maximum inventory should agree with the permit.) | — | ✓ | — | — |
| d) A description of steps taken to decontaminate facility equipment. | — | ✓ | — | — |
| e) The year closure is expected to begin and a schedule for the various phases of closure. | — | ✓ | — | — |
| 2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates. (265.112(4)(B)) [3745-66-12(B)] | — | ✓ | — | — |
| 3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process. (265.112(4)(C)) [3745-66-12(C)] | — | ✓ | — | — |

REMARKS - #1 - NO CLOSURE PLAN HAS BEEN DEVELOPED.

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart H: Financial Requirements

1. The owner or operator of the facility has established financial assurance for closure by use of one of the following: (265.143) [3745-66-43]

a) A closure trust fund, or

b) A surety bond, or

c) A closure letter of credit, or

d) A combination of financial mechanisms.

2. A written cost estimate for closure of the facility (as specified in the closure plan) is available. How much is it?

3. When was the most recent estimate made?

4. A written cost estimate for post closure care of the facility (if applicable) is available. How much is it?

5. When was the most recent estimate made?

—	✓	—	# 1
—	✓	—	# 1
—	✓	—	# 1
—	✓	—	# 1
—	✓	—	# 1
—	✓	—	# 1
—	✓	—	# 1
—	✓	—	# 1

REMARKS, GENERAL INTERIM STATUS REQUIREMENTS

REMARKS - #1, NO FINANCIAL ASSURANCE HAS BEEN ESTABLISHED.

NOTE: THIS FORM DOES NOT INCLUDE LIABILITY REQUIREMENTS OF 40 CFR 265.147 AND DAC 3745-66-47.

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart N: Landfills

1. General Operating Requirements. Does the facility provide the following:

NOTE: 1a, 1b AND 1c ARE EFFECTIVE ON NOVEMBER 19, 1981.

a) Diversion of run-on away from active portions of the fill? (265.302(a)) [3745-68-02(A)]	—	✓	—	# 1
b) Collection of run-off from active portions of the fill? (265.302(b)) [3745-68-02(B)]	—	✓	—	# 1
c) Is collected run-off treated? [3745-68-02(B)]	—	✓	—	# 1
d) Control of wind dispersal of hazardous waste? (265.302(d)) [3745-68-02(D)]	—	✓	—	# 1
2. Surveying and Recordkeeping. Does the operating record include: [3745-68-09]				
a) a map showing the exact location and dimensions of each cell? (269.309(a)) [3745-68-09(A)]	—	✓	—	# 1
b) The contents of each cell and the location of each hazardous waste type within each cell? (269.309(b)) [3745-68-09(B)]	—	✓	—	# 1
3. Closure and Post-Closure				
a) Is the closure Plan available for inspection?	—	✓	—	# 2
b) Has this plan been submitted to the Regional Administrator?	—	✓	—	# 2
c) Has Closure begun?	—	✓	—	# 2
d) Is Closure cost estimate available by?	—	✓	—	# 2

REMARKS - #1 OPERATING REQUIREMENTS INCLUDE SPECIFIC DESIGN,
CONSTRUCTION, OPERATION AND MAINTENANCE CRITERIA
FOR RUN-OFF AND RUN-ON CONTROL AND
WIND DISPERSAL
LANDFILLS - 1

#2 - NO CLOSURE PLANS DEVELOPED

#3 - A DRUM WAS OBSERVED IN WASTE MATERIAL

Revised 12/84

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

4. Special requirements for ignitable or reactive waste. (265.312(a)(B))

- a) Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive?

___ ___ ✓ ___

NOTE: IF WASTE IS RENDERED NON-REACTIVE OR NON-IGNITABLE, SEE TREATMENT REQUIREMENTS. IF NOT, THE PROVISIONS OF 40 CFR 265.17(b) APPLY. [3745-65-17]

5. Special requirements for Incompatible Wastes.

- a) Does the owner or operator dispose of incompatible wastes in separate cells? If not, the provisions of 40 CFR 265.17(b) apply. [3745-65-17]

___ ___ ✓ ___

6. Special requirements for Containers:

Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill? (265.315) [3745-57-85]

___ ✓ ___ # 3

7. Special requirements for Liquid Waste.

Bulk or non-containerized liquid waste or waste containing free liquids is placed in a landfill having a liner and leachate collection and removal system meeting 264.301(a) requirements or is treated so that free liquids are no longer present. (265.314(a)) [3745-68-14(A)]

___ ✓ ___ ___

8. A written Post-Closure Plan is on file at the facility.

___ ✓ ___ # 2

9. The Post-Closure Plan has been amended within 60 days in response to any changes in facility design or operation. (265.118(b))

___ ✓ ___ # 2

10. The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure. (265.118(c))

___ ✓ ___ # 2

11. The property owner has attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under Section 265.117(c) [3745-66-17(C)] as required in Section 265.120 [3745-66-10].

___ ✓ ___ ___

AUGUST 27, 1987, 10:00 AM
Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

GENERAL INFORMATION

Facility: AMERICAN STEEL FOUNDRIES Address: 1001 E. BROADWAY City: ALLIANCE
State: OHIO Zip Code: 44601 County: STARK Telephone: 216/823-6150

HWFAB #

U.S. EPA I.D. # OH0981909418

SEE
REMARK
#1

INSPECTION PARTICIPANT(S)

(Name)	(Title)	(Telephone)
1. <u>DAVID E. STATLER</u>	<u>WORKS ENGINEER</u>	<u>216/823-6150</u>
2. <u>CHARLES A. RUDD</u>	<u>MGR. QUALITY AND ENVIRONMENTAL AFFAIRS</u>	<u>312/938-4018</u>
3. _____	_____	_____

INSPECTOR(S)

1. <u>KEVIN M. BONZO</u>	<u>ENVIRONMENTAL SCIENTIST</u>	<u>216/425-9171</u>
2. <u>LENNIE TUCKERMAN</u>	<u>ENVIRONMENTAL SCIENTIST</u>	<u>216/425-9171</u>
3. _____	_____	_____

INSTALLATION ACTIVITY

Mark One

- ☒ Generator only (G)
- ☐ Transporter (T)
- ☐ TSDF only
- ☐ G-T
- ☐ G-TSDF
- ☐ T-TSDF
- ☐ G-T-TSDF

If the site is a TSDF, check the boxes indicating which areas were reviewed.

- ☒ General Facility Standards, Preparedness and Prevention, Contingency and Emergency Manifests/Records/Reporting, Closure
- ☒ Containers S01
- ☐ Tanks S02/T01
- ☐ Surface Impoundments S04/T02
- ☐ Incineration/Thermal Treatment

- ☐ Waste Piles S03
- ☐ Land Treatment D01
- ☐ Landfills D00
- ☐ Chemical/Physical/Biological T04
- ☐ Groundwater Monitoring
- ☐ Post-Closure

RCRA INTERIM STATUS INSPECTION FORM

1. Has the facility submitted a Part A to Ohio?

2. If "yes", is it complete and accurate?

3. Has the facility submitted a Part B?

4. Was advance notice of the inspection given? If so, how far in advance?

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
—	✓	—	—
—	—	✓	—
—	✓	—	—
✓	—	—	~ 2 WKS

IF THE SITE HAS RECEIVED A PART B PERMIT, USE THE RCRA STATUS INSPECTION FORM.

REMARKS, GENERAL INFORMATION

Include a brief description of site activity and waste handling.

REMARK #1 - US EPA ID NUMBER WAS OBTAINED
BY US EPA FOR TRACKING PURPOSES.
ASF HAS NOT APPLIED FOR ID NUMBER
FOR THIS PRODUCTION FACILITY.

SITE DESCRIPTION - ASF IS A STEEL CASTING FACILITY WHICH
MANUFACTURES EQUIPMENT FOR THE RAILROAD INDUSTRY.
STEEL SCRAP IS USED EXCLUSIVELY IN THE SAND CASTING OPERATIONS.
ELECTRIC ARC FURNACE DUST IS COLLECTED IN A BAGHOUSE
AND THEN TRANSFERRED INTO DRUMS. PRIOR TO MAY, 1987
THIS WASTE (D006, D008) WAS MIXED WITH CLARIFIER
SLUDGE AND DISPOSED OFF-SITE.
INFORMATION - (PRESENTLY THIS MATERIAL IS USED TO RECHARGE FURNACE.)

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RCRA INTERIM STATUS INSPECTION FORM

40 CFR 262 (OAC 3745-52) GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11. [3745-52-11(D)]	<u> </u>	<u> ✓ </u>	<u> </u>	<u># 1</u>
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 [3745-51-04] (statutory exclusions) or Section 261.6 [3745-51-06(A)(1)] (recycle/reuse)?	<u> </u>	<u> ✓ </u>	<u> </u>	<u> </u>
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) [3745-65-01] or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10) [3745-65-01]	<u> </u>	<u> ✓ </u>	<u> </u>	<u> </u>
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) [3745-52-21] and the minimum number of copies required by Section 262.22 [3745-52-22].	<u> </u>	<u> ✓ </u>	<u> </u>	<u># 2</u>
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20 [3745-52-20(B)(C)(D)].	<u> </u>	<u> ✓ </u>	<u> </u>	<u># 2</u>
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23 [3745-52-23(A)(1 and 2)].	<u> </u>	<u> ✓ </u>	<u> </u>	<u># 2</u>
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a)(b) [3745-52-42].	<u> </u>	<u> ✓ </u>	<u> </u>	<u># 2</u>
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40 [3745-52-40]. (262.40(a)) [3745-52-40(a)]	<u> </u>	<u> ✓ </u>	<u> </u>	<u># 2</u>

RCRA INTERIM STATUS INSPECTION FORM

5. The generator meets the following hazardous waste pre-transport requirements:

- a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a)) [3745-52-30, 3745-52-31, 3745-52-32]
- b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b) [3745-52-32].
- c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33 [3745-52-33].

6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50 [3745-52-50]

7. If the generator elects to store hazardous waste on-site in containers or tanks for 90 days or less without a RCRA storage permit as provided under Section 262.34 [3745-52-34], the following requirements with respect to such storage are met:

- a) The containers are clearly marked with the words "Hazardous Waste".
- b) The date that accumulation began is clearly marked on each container.

8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) [3745-65-16(A)(B)(C)] including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. (Section 262.34) [3745-52-34(A)(4)]

9. The generator keeps all of the records required by Section 265.16(d)(e) [3745-65-16(D)(E)] including written job titles, job descriptions and documented employee training records (Section 262.34) [3745-52-34(A)(4)].

Yes No N/A Remark #

— ✓ — # 3

— ✓ — # 3

— ✓ — # 3

— — ✓ —

— ✓ — —

— ✓ — —

— ✓ — # 4

— ✓ — # 4

RCRA INTERIM STATUS INSPECTION FORM

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265 [3745-65], SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, GENERATOR REQUIREMENTS

- # 1 - ELECTRIC ARC FURNACE DUST HAS BEEN TESTED AND ACKNOWLEDGED TO BE HAZARDOUS BY EP TOXICITY CRITERIA FOR LEAD(D008) AND CADMIUM(D006). HOWEVER, GRINDING SLUDGE HAS NOT BEEN CHARACTERIZED
- # 2 —
- # 3 — MANIFESTS WERE NEVER PREPARED OR MAINTAINED, SHIPMENTS WERE NOT PLACARDED
- # 4 — THE REGULATORY REQUIREMENTS FOR THESE ITEMS ARE SPECIFIC TO PERSONS RESPONSIBLE FOR HAZARDOUS WASTE MANAGEMENT.
- # 5 - 'RELEASE' OF EAF DUST BENEATH BAGHOUSE
→ (FROM FOLLOWING PAGE)

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31) [3745-65-31] ✓ — — #5
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32) [3745-65-32(A)(B)(C)(D)]
 - a) Internal alarm system. — — ✓ —
 - b) Access to telephone, radio or other device for summoning emergency assistance. ✓ — — —
 - c) Portable fire control equipment. — — ✓ —
 - d) Water of adequate volume and pressure via hoses sprinkler, foamers or sprayers. — — ✓ —
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) [3745-65-33] — ✓ — —
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) [3745-65-34] ✓ — — —
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35) [3745-65-35] — ✓ — —
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)) [3745-65-37(A)] — — ✓ —
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)) [3745-65-37(B)] — — ✓ —

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes (265.51) [3745-65-52(A)(B)(C)(D)(E)] and contains the following components:
 - a) Actions to be taken by personnel in the event of an emergency incident. ASF HAS NOT DEVELOPED A CONTINGENCY PLAN
 - b) Arrangements or agreements with local or state emergency authorities.
 - c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.
 - d) A list of all emergency equipment including location, physical description and outline of capabilities.
 - e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) [3745-65-52(F)]
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) [3745-65-53(A)(B)]
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54) [3745-65-54]
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56) [3745-65-55]
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56(a-j). [3745-65-56(A-J)]

RCRA INTERIM STATUS INSPECTION FORM

Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173) [3745-66-73(A)]	—	✓	—	—
b) In good physical condition (265.171) [3745-66-71]	✓	—	—	—
c) Compatible with the wastes stored in them (265.172) [3745-66-72]	✓	—	—	—
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a)) [3745-66-73(A)]	—	✓	—	—
3. Hazardous waste containers are stored, handled and opened in a manner which prevents container rupture or leakage. (265.173(b)) [3745-66-73(B)]	✓	—	—	SPILLAGE EVIDENT ON GROUND
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174) [3745-66-74]	—	✓	—	—
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176) [3745-66-76]	—	—	✓	—
6. Containers holding hazardous wastes are stored separate from other materials which may interact with the waste in a hazardous manner. (265.177(c)) [3745-66-77(C)]	—	—	✓	—

Squire, Sanders & Dempsey

Additional Offices:

*Brussels, Belgium
Columbus, Ohio
Miami, Florida
New York, New York
Phoenix, Arizona
Washington, D.C.*

*Counsellors at Law
1800 Huntington Building
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October 28, 1987

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Telex 985-661

Telecopier 1 (216) 687-8777

Telecopier 2 (216) 687-8780

Direct Dial Number

216/687-8646

Mr. Kevin Bonzo
Environmental Scientist
Division of Solid and Hazardous
Waste Management
Northeast District Office
2110 E. Aurora Road
Twinsburg, Ohio 44087-1969

Re: American Steel Foundries

Dear Mr. Bonzo:

I have been asked by American Steel Foundries to assist the company in preparing a response to your September 28, 1987 letter. In order to prepare a response, I am requesting a two-week extension of time in which to send a reply.

I thank you for your anticipated cooperation.

Sincerely,

Geoffrey K. Barnes
Geoffrey K. Barnes

GKB:bac

RECEIVED

NOV 2 - 1987

OHIO EPA-N.E.D.O.

*RESPONDED
VIA TELEPHONE
11/4/87
(SEE PHONE LOG)*

Squire, Sanders & Dempsey

Additional Offices:

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November 11, 1987

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Direct Dial Number

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Mr. Kevin Bonzo
Ohio Environmental Protection
Agency, Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087-1969

Re: American Steel Foundries
1001 East Broadway
Alliance, Ohio 44601
EPA I.D. No. OHD981090418; and
Sebring Township, Ohio
EPA I.D. No. OHD017497587

Dear Mr. Bonzo:

On behalf of American Steel Foundries (ASF), I am replying to your letter of September 28, 1987.

As a preliminary matter, it appears that your September 28, 1987 letter is basically a reiteration of claims or allegations previously made by your office. ASF has previously responded to essentially all of the allegations. To avoid unnecessary repetition, I have attached copies of my letters dated June 7, 1987 and August 25, 1987 (attachments A and B), which state ASF's position and interpretations, and which generally address the claimed violations.

The following responses will refer to the numbered paragraphs in your September 28, 1987 letter.

Production Facility

1. In August, 1980, ASF Alliance filed the Notification of Hazardous Waste Activity form. The form was preprinted with one of the I.D. numbers listed above.

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NOV 13 1987

OHIO EPA-N.E.D.O.

Kevin Bonzo
November 11, 1987
Page 2

In November, 1980, ASF Alliance submitted a protective filing for RCRA interim status. The application was withdrawn in 1982 when testing confirmed that none of the materials disposed were hazardous wastes as defined by any regulations under the Resource Conservation and Recovery Act (RCRA) or its Ohio counterpart. The June 25, 1982 letter requesting withdrawal expressly requested that the facility ID number be retained. The company has no reason to believe that U.S. EPA did not follow the express request to retain the I.D. number. In any event, correspondence from the U.S. EPA has indicated the above two listed I.D. numbers as applicable to, respectively, the production facility and the landfill.

2. Contrary to the assertion in paragraph 2 of your letter, a hazardous waste determination was made for the sludge generated during the grinding operation. The process involves a wet grinding of a steel casting with a coolant. Through the company's knowledge of the materials and the processes involved, including information provided by the coolant supplier, ASF had determined that the process would and did not generate a hazardous waste. If knowledge of the process supports such a determination, then the applicable regulations do not require that a separate test be performed. See e.g., 40 C.F.R. Section 262.11(c)(2).

3. By letters dated June 7, 1985 and August 8, 1985 (attachments A and B), ASF responded to the previous Ohio EPA inspection on April 26, 1985. As noted in those letters, ASF has not shipped hazardous wastes requiring manifests to its Sebring Township landfill.

4. The containers presently at ASF Alliance holding electric arc furnace baghouse dust (EAF dust) are holding such material for recycling to recover metal content therein by remelting. As such, the EAF material is not a solid waste under 40 C.F.R. 261.2(e) and is not subject to RCRA labeling requirements. See attachments A and B and discussion below.

5. The personnel training requirements of 40 C.F.R. 265.16 are applicable to hazardous waste treatment, storage or disposal facilities. ASF Alliance is not such a facility. See attachments A and B.

6. The "release" observed during the August 27, 1987 inspection was apparently a small amount of EAF dust beneath the hopper. The material was cleaned up and recycled. As the material is held for recycling, 40 C.F.R. 265.31 is not applicable as the material is not a hazardous waste.

Kevin Bonzo
November 11, 1987
Page 3

7-11. The specific citations of interim status regulations applicable to hazardous waste treatment, storage or disposal facilities are inapplicable to the ASF Alliance facility as it does not treat, store nor dispose of hazardous waste as explained above. See attachments A and b.

12. Generator reports are not required of the ASF Alliance facility as it does not generate over 1000 kg/mo. of hazardous wastes.

Other Issues

The introductory portion of your September 28, 1987 letter refers to "reservations" of the Northeast District Office staff of the "legitimacy" of ASF's recycling of electric arc furnace dust for metal recovery. I do not understand the basis for any reservations. Both federal and state regulations provide that certain recycling activities are exempt from regulation under RCRA or its state counterpart. (Indeed, RCRA was intended to encourage recycling activities.) U.S. EPA has acknowledged that it has no jurisdiction under RCRA to regulate the reuse or reclaiming of secondary materials (which would otherwise be hazardous waste) in the furnace which produces them. See 50 Fed. Reg. 630 (January 4, 1985); 50 Fed. Reg. 49167 (November 29, 1985); 52 Fed. Reg. 16989-90 (May 6, 1987). These materials cease being hazardous wastes upon reuse or reclamation in this manner. Reuse of dust generated by an electric arc furnace within that furnace is clearly not regulated under RCRA or U.S. EPA regulations, and Ohio has no statutory authority to exceed the federal standards for hazardous waste regulations. Among other things, iron oxides in the electric arc furnace dust are incorporated into the product and serve as a substitute for raw materials. Under these circumstances, both Ohio and federal regulation clearly exempt this reuse activity from all RCRA regulation. Further, to the extent that either federal or state regulations would purport to regulate these activities, the regulations would be unlawful, as the United States Court of Appeals for the District of Columbia Circuit has recently stated in American Mining Congress v. EPA, 824 F.2d 1177 (D.C. Cir., 1987).

Please note that ASF is continuing to assess the present practice of recycling the electric arc furnace dust at the production facility. The company has not yet made a final decision as to the long term practices regarding the baghouse dust.

Kevin Bonzo
November 11, 1987
Page 4

In the "other issues" section of your letter, you indicated that you will be informing the local air agency of the recycling process so that they may evaluate compliance with the company's air permit. Although we do not understand the relevance of this issue in connection with a RCRA inspection, we assume that any air permit compliance issues will be addressed by the local air agency, and ASF will respond to any questions raised by that group.

Disposal Facility

Items 1-13 of the listed violations all can be answered by the general statement of ASF's position in attachments A and B. Hazardous wastes were not disposed of at the landfill. As such, the landfill is not an RCRA disposal facility and all listed violations of 40 C.F.R. 265 are, as such, not applicable to the facility.

14. Since the disposal facility did not receive hazardous wastes, the referenced regulations do not apply.

Items 15 and 16 are again answered as per items 1-13, in that the facility is not a hazardous waste landfill and, as such, the cited regulations are not applicable.

Your September 28, 1987 letter suggests the need to "rinse" the containers previously used to combine electric arc furnace dust with clarifier sludge. For reasons outlined in attachments A and B, we do not believe that any of the associated containers are subject to the cited regulations. Even assuming, however, that the regulations applied, ASF does not believe that any hazardous wastes remained in the containers.

Conclusion


It seems apparent that there remains a broad difference of opinion between ASF and the Ohio EPA Northeast District Office as to the interpretation of laws and regulations. Despite these apparent

Squire, Sanders & Dempsey

Kevin Bonzo
November 11, 1987
Page 5

differences, ASF would like to meet with the Ohio EPA Northeast District Office before too long in order to attempt to resolve some of these issues.

Very truly yours,


Geoffrey K. Barnes

GKB/ma

cc: E.J. Brosius, Esq.
C.R. Dixon
C.A. Ruud



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149

Richard F. Celeste
Governor

MEMORANDUM

TO: Dave Rankin, USEPA
FROM: John Albrecht
RE: Amsted Information
DATE: April 6, 1990

Here is some information on Amsted. Let me know if you need additional information.

General Information

Amsted (American Steel Foundries)
1001 E. Broadway
Alliance, Ohio

- Indirect discharger to the Alliance POTW.
- Discharge flow approximately 256,000 gpd
- Categorical industry regulated under 40 CFR 464 Subpart C

Compliance Status

The following was taken from Alliance's Quarterly Industrial User Violation Reports:

Period of October, 1989 - January, 1990

Exceeded monthly average for phenols and daily maximum for oil and grease. NOV issued by the city for 464 violations.

Facility has completed jar studies for phenol. Further studies needed. Facility searching for oil and grease entering process water.

Period of January, 1989 - April, 1989

Monthly average violations for phenols. NOV sent by the city. Two meetings were held with the facility.

The last two IU self-monitoring reports are attached.

DAILY REPORT FORM

REPORTED



NAME, ADDRESS, CITY, COUNTY, ZIP

STATION CODE

DATE (MONTH, YEAR)

PAGE PRINTING DATE APPLICATION NO

CITY OF ALLIANCE
251 ROCKHILL, NE
ALLIANCE 44601
STARK

SAMPLING STATION DESCRIPTION
AMSTED (AMERICAN STEEL

not company generated!

IN(1) - ENTER 1 FOR CONTINUOUS, 2 FOR COMPOSITE, 3 FOR GRAB SAMPLE

REPORTING LAB

THIS FORM MUST BE TYPE

IN(2) - ENTER FREQUENCY OF SAMPLING

(1)	1	2	2	2	2	3				
(2)	997	3	3	3	3	1				
	FLOW GPD REPORTING CODE	COPPER CU, TOT UG/L REPORTING CODE	LEAD PB, TOT UG/L REPORTING CODE	ZINC ZN, TOT UG/L REPORTING CODE	PHENOLS MG/L REPORTING CODE	TTO UG/L REPORTING CODE	O & G MG/L REPORTING CODE	PH S.U. REPORTING CODE	REPORTING CODE	REPORTING CODE
DAY	00056	01042	01051	01092		82090		00402		
01	256,000	10	50	12	.180		1	7.5		
02	256,000	10	50	110	.270		1	7.4		
03	256,000	10	50	67	.090		1	7.3		
04	256,000	10	50	67	.120		4.0	6.2		
05	256,000	13	50				1	7.2		
06										
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TOTAL	1,280,000	53	250	256	.66		8	36.2		
AVG.	256,000	11	50	64	.165		2	7.2		
MAX.	256,000	13	50	110	.270		4	7.5		
MIN.	256,000	10	50	12	.080		1	6.2		

ADDITIONAL REMARKS (AM REPORTING CODES MUST BE EXPLAINED IN THIS SECTION)

Limits: Cu = .108/.059 Zn = .545/.208 pH = 6-9
(mg/l) Pb = .292/.144 Phenols = .307/.106
TTO = .718/.234 O & G = 11.1/3.70

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YELLOW - AGENCY
GREEN - REPORTER

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DATE REPORT COMPLETED Aug. 11, 1989	SIGNATURE OF REPORTER <i>[Signature]</i>	TITLE OF REPORTER Coordinator
--	---	----------------------------------

FORM NO. EPA-4500 (8-88)
FORMERLY EPA-SUR-4

APR 06 1990 12:28

MONTHLY REPORT FORM

REPORTED

Ohio EPA

NAME, ADDRESS, CITY, COUNTY, ZIP

STATION CODE

DATE (MONTH, YEAR)

PAGE OF PRINTING DATE APPLICATION NO

ALLIANCE WWTP

FEB 1990

1 1

51 ROCKHILL AVE. NE

SAMPLING STATION DESCRIPTION

ALLIANCE, OH 44601

STARK

AMSTED (AMERICAN STEEL FOUNDRIES)

NOTE: THIS FORM MUST BE TYPE

IN(1) - ENTER 1 FOR CONTINUOUS, 2 FOR COMPOSITE, 3 FOR GRAB SAMPLE

REPORTING LAB

ANALYST

IN(2) - ENTER FREQUENCY OF SAMPLING

(1)	1	2	2	2	2	3	3	3		
(2)	999	3	3	3	3	1	1	1		
	FLOW GPD REPORTING CODE	COPPER CU TOT UG/L REPORTING CODE	LEAD PB TOT UG/L REPORTING CODE	ZINC ZN TOT UG/L REPORTING CODE	PHENOLS MG/L REPORTING CODE	TTO UG/L REPORTING CODE	O & G MG/L REPORTING CODE	PH S.U. REPORTING CODE	REPORTING CODE	REPORTING CODE
DAY	00056	01042	01051	01092		82090		00402		
01	256000	AA	AA	53	.020		8	7.3		
02	256000	11	AA	62	.020		4	7.0		
03	256000	AA	AA	60	.230		36	7.2		
04	264480	4	AA	28	.170		AA	7.2		
05	269280	14	AA	74	.260		5	7.6		
06	269280	AA	AA	15	.140		2.9	7.54		
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TOTAL	1571040	29	AA	292	.84		55.9	43.84		
AVG.	261840	4.8	AA	48.6	.14		9.3	7.3		
MAX.	269280	14	AA	74	.26		36	7.6		
MIN.	256000	AA	AA	15	.02		AA	7.0		

ADDITIONAL REMARKS (AN REPORTING CODES MUST BE EXPLAINED IN THIS SECTION)

ITS: cu = .108/.059 zn = .545/.208
 (.../1) pb = .292/.144 phoneols = .307/.106
 tto = .718/.234 O & G = 11.1/3.70

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DATE REPORT COMPLETED

SIGNATURE OF REPORTER

TITLE OF REPORTER

Jan. 30, 1990

Joseph A. Amabile

Coordinator

FORM NO. EPA-4500 (8-86)
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